

Facility ID: 0243000241 Issuance type: Title V Draft Permit

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 III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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Part II - Specific Facility Terms and Conditions

a State and Federally Enforceable Section

1. None

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b State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

B001-HQ steam boiler (HQSB00001)
 B002-HQ steam boiler (HQSB00002)
 B013-HQ steam boiler (HPSB00001)
 B014-HQ steam boiler (PDSB00002)
 B015-PD steam boiler (PDSB00003)
 P001-155 laboratory hoods in HQ, PD, and LS buildings
 T001-10,000 gallon number 2 oil tank (oil tank #1)
 T002-15,000 gallon number 2 oil tank (oil tank #2)
 Z013-10 gallon GLS reactor system (R-7500)
 Z014-10 gallon SS reactor system (R-7600)
 Z015-10 gallon SS reactor system (R-7700)
 Z018-single cavity bag filter (S-9800)
 Z026-Sparkler plate filter (S-1600)
 Z031-Sparkler plate filter (S-8000)
 Z035-single cavity bag filter (S-9500)
 Z036-jacketed single cavity bag filter (S-9900)
 Z038-reactive extrusion unit (R-5100)
 Z039-HQ steam boiler (HQSB00003)
 Z040-PD water boiler (PDWB00001)
 Z041-PD water boiler (PDWB00002)
 Z042-LS steam boiler (LSSB00001)
 Z043-LS steam boiler (LSSB00002)
 Z044-LS steam boiler (LSSB00003)
 Z046-LS water boiler (LSWB00002)
 Z052-PD water heater (PDWB00003)
 Z053-PD water heater (PDWB00004)
 Z058-PD steam boiler (PDSB00004)
 Z059-PD steam boiler (PDSB00005)
 Z076-PD steam boiler (PDSB00004)
 Z077-PD steam boiler (PDSB00005)
 Z079-single cavity bag filter (S-14400)

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within a Permit to Install for the emissions unit.

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0243000241 Emissions Unit ID: N001 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
Consumat C125P, multi-chamber incinerator equipped with an afterburner and rated at 350 PTI 02-293 pounds per hour for types 0 and 4 wastes	OAC rule 3745-31-05(A)(3)	None.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack associated with this emissions unit shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.
	OAC rule 3745-17-09(B)	Particulate emissions shall not exceed 0.10 pound per 100 pounds of refuse material charged.

2. Additional Terms and Conditions

- (a) None

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II. Operational Restrictions

1. Only properly trained personnel shall operate the incinerator.
2. The permittee shall ignite the afterburner 30 minutes prior to ignition of refuse material and continue its use during the entire burn cycle.
3. The permittee shall operate and maintain the incinerator and all associated equipment so as to prevent the emission of objectionable odors.

4. The permittee shall not charge this emissions unit with "infectious waste" as defined in OAC rule 3745-75-01 (C)(4).
5. The secondary combustion chamber exhaust gas temperature shall be maintained at a minimum of 1400 degrees Fahrenheit.
6. The waste material feed rate to this incinerator shall be limited to 350 pounds per hour.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder for the secondary combustion chamber exhaust gas temperatures. The temperature monitor and recorder shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and applicable operating manual(s).
2. The permittee shall keep a log of the material charged, in pounds per hour, for each day that the unit is in operation.
3. The permittee shall maintain copies of the records for the secondary combustion chamber exhaust gas temperature and of the daily log of charge rates at the facility for a period of at least five years. Those records shall be made available for Ohio EPA or their representatives to review during normal working hours.

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IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports for all hours of operation during which the charge rate exceeded 350 pounds per hour, including the actual charge rates for all such hours of operation.
2. The permittee shall submit deviation (excursion) reports which provide the following information for each period during which the secondary combustion chamber exhaust gas temperature falls below 1400 degrees Fahrenheit:
 - a. the date of the excursion;
 - b. the time interval over which the excursion occurred;
 - c. the temperature values during the excursion;
 - d. the cause(s) for the excursion; and
 - e. the corrective action which has been or will be taken to prevent similar excursions in the future.
3. The permittee shall submit deviation (excursion) reports on a semi-annual basis, i.e., by January 31 and July 31 of each year for the previous six calendar months.

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V. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

Visible particulate emissions from the stack associated with this emissions unit shall not exceed twenty percent opacity as a six-minute average.

Applicable Compliance Method:

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

Particulate emissions shall not exceed 0.10 pound per 100 pounds of refuse material charged.

Applicable Compliance Method:

If required, compliance shall be determined through stack testing performed using the requirements established in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0243000241 Emissions Unit ID: N001 Issuance type: Title V Draft Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
Consumat C125P, multi-chamber incinerator equipped with an afterburner and rated at 350 pounds per hour for types 0 and 4 wastes	None.	None.

2. **Additional Terms and Conditions**

- 1. None

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II. **Operational Restrictions**

- 1. None

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

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0243000241 Emissions Unit ID: P007 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
Pressure filter, SS, 36 inches, S-12200	OAC rule 3745-21-07(G)(2) OAC rule 3745-31-05(A)(3) PTI 02-13904	See A.I.2.a below. See A.I.2.b and A.I.2.c below.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).

2. Additional Terms and Conditions

- a. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day nor more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01. Emissions of organic materials from cleanup with photochemically reactive materials shall be included in the calculation of actual emissions when determining compliance with the 8 pounds per hour and 40 pounds per day limits.
- b. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are not employed, applied, evaporated, or dried, the permittee shall emit no more than 50 (fifty) pounds per hour of organic compounds.
- c. The emissions of organic compounds from emissions units P007 through P015, P018 through P020, and P024 through P036, combined, shall be limited to 75 (seventy five) tons per year.

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II. Operational Restrictions

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall keep the following daily records for all materials used in this emissions unit:
 - a. the identification of the chemical compound and its physical state; and
 - b. for any liquid organic materials, whether or not each material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall develop an emission factor for the total amount of organic compounds emitted for each final product generated in this emissions unit. The emission factors shall be in units of pounds of organic compounds emitted per pound of final product generated. The permittee shall indicate whether or not each emission factor is based upon the use of any photochemically reactive materials. The permittee's calculation of each emission factor shall be subject to the review and approval of the Ohio EPA Northeast District Office.
3. The permittee shall collect and record the following information for each final product generated in this emissions unit:
 - a. the company identification for each final product generated;
 - b. whether or not any photochemically reactive materials were used to generate each final product;
 - c. the quantity of each final product generated, in pounds;
 - d. the emission factor for each final product generated, in pounds of organic compounds emitted per pound of

- final product generated;
- e. the number of days the emissions unit was in operation to generate each final product; and
 - f. the average daily organic compound emission rate, in pounds per day $(c \times d)/e$.
4. The permittee shall collect and record the following information each day for all final products generated in this emissions unit:
- a. For each day during which any photochemically reactive material was used as a cleanup material and/or for one or more of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from $i = 1$ to $i = n$, of A.III.3.f).
 - b. For each day during which no photochemically reactive material was used as a cleanup material and/or for any of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from $i = 1$ to $i = n$, of A.III.3.f).
5. The permittee shall collect and record the following information for the cleanup materials employed each day in this emissions unit:
- a. the company identification for each cleanup material;
 - b. whether or not each cleanup material is a photochemically reactive material;
 - c. the quantity of each cleanup material employed that is a photochemically reactive material, in gallons;
 - d. the OC content of each cleanup material employed that is a photochemically reactive material, in pounds per gallon;
 - e. the quantity of each cleanup material employed that is not a photochemically reactive material, in gallons;
 - f. the OC content of each cleanup material employed that is not a photochemically reactive material, in pounds per gallon;
 - g. the daily emissions of the cleanup materials that are photochemically reactive materials, in pounds per day (the summation, from $i = 1$ to $i = n$ of $c \times d$);
 - h. the daily emissions of the cleanup materials that are not photochemically reactive materials, in pounds per day (the summation, from $i = 1$ to $i = n$ of $e \times f$); and
 - i. the total daily OC emissions from all cleanup materials, in pounds per day $(g + h)$.
6. The permittee shall collect and record the following information each day for this emissions unit:
- a. the number of hours of operation;
 - b. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per day $(A.III.5.g + A.III.4.a)$;
 - c. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the average hourly emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per hour $(A.III.6.b/A.III.6.a)$;
 - d. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are not photochemically reactive materials, in pounds per day $(A.III.5.h)$;
 - e. for each day during which no photochemically reactive material was used for any of the final products and/or any of the cleanup materials, the total daily emissions from all final products and all cleanup materials, in pounds per day $(A.III.5.h + A.III.4.b)$;
 - f. for each day during which no photochemically reactive material was used for any of the final products and/or any of the cleanup materials, the average hourly emissions from all final products and all cleanup materials, in pounds per hour $(A.III.6.e/ A.III.6.a)$; and
 - g. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions for all final products and all cleanup materials, in pounds per day $(A.III.6.b + A.III.6.d)$.
7. The permittee shall record annually the OC emissions from this emissions unit and from emissions units P007 through P015, P018 through P020, and P024 through P036, combined. The annual emission (in tons) for this emissions unit shall be calculated by summing the values from A.III.6.e and A.III.6.g for the entire calendar year and then dividing by 2000.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 8 pounds per hour, and the actual average organic compound emission rate for each such day.

- b. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - c. For the days during which no photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the emissions unit exceeded 50 pounds per hour, and the actual organic compound emission rate for each such day.
2. Each year, the permittee shall submit an annual report, by March 31, for the preceding calendar year. Each annual report shall specify the annual OC emissions for this emissions unit and for emissions units P007 through P015, P018 through P020, and P024 through P036, combined.

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V. **Testing Requirements**

1. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.
2. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.
3. Emission Limitation: On the days that no photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit no more than 50 (fifty) pounds per hour of organic compounds.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.
4. Emission Limitation: 75 tons OC per year from emissions units P007 through P015, P018 through P020, and P024 through P036, combined.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.
5. Formulation data shall be used to determine the organic compound contents of the materials employed for each final product and each cleanup material.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0243000241 Emissions Unit ID: P007 Issuance type: Title V Draft Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
2.	Pressure filter, SS, 36 inches, S-12200	None	None
	Additional Terms and Conditions		
1.	None		

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II. **Operational Restrictions**

1. None

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

1. The permit to install for this emissions unit (P007) was evaluated based on the actual materials employed and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant potentially emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each of the potential pollutants discharges from P007:

Pollutant: acetic acid
 TLV (ug/m3): 25000
 Maximum Hourly Emission Rate (lbs/hr): 0.8
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3)*: 60 (EF45) and 54 (EF76)
 MAGLC (ug/m3): 2500

Pollutant: acetone
 TLV (ug/m3): 1188000
 Maximum Hourly Emission Rate (lbs/hr): 49.3
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3609 (EF45) and 3258 (EF76)
 MAGLC (ug/m3): 118800

Pollutant: acetonitrile
 TLV (ug/m3): 67000
 Maximum Hourly Emission Rate (lbs/hr): 3.3
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 238 (EF45) and 215 (EF76)
 MAGLC (ug/m3): 6700

Pollutant: cyclohexane
 TLV (ug/m3): 1030000
 Maximum Hourly Emission Rate (lbs/hr): 7.2
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 530 (EF45) and 479 (EF76)
 MAGLC (ug/m3): 103000

Pollutant: dimethylformamide
 TLV (ug/m3): 30000
 Maximum Hourly Emission Rate (lbs/hr): 0.3
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 19 (EF45) and 17 (EF76)
 MAGLC (ug/m3): 3000

Pollutant: ethyl acetate
 TLV (ug/m3): 1440000
 Maximum Hourly Emission Rate (lbs/hr): 7.2
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 523 (EF45) and 473 (EF76)
 MAGLC (ug/m3): 144000

Pollutant: ethyl alcohol
 TLV (ug/m3): 1880000
 Maximum Hourly Emission Rate (lbs/hr): 2.4
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 175 (EF45) and 158 (EF76)
 MAGLC (ug/m3): 188000

Pollutant: heptane
 TLV (ug/m3): 1640000
 Maximum Hourly Emission Rate (lbs/hr): 4.0
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 291 (EF45) and 262 (EF76)
 MAGLC (ug/m3): 164000

Pollutant: isopropyl acetate
 TLV (ug/m3): 1044000
 Maximum Hourly Emission Rate (lbs/hr): 5.4
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 393 (EF45) and 355 (EF76)
 MAGLC (ug/m3): 104400

Pollutant: isopropyl alcohol
 TLV (ug/m3): 983000
 Maximum Hourly Emission Rate (lbs/hr): 2.4

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 174 (EF45) and 157 (EF76)

MAGLC (ug/m3): 98300

Pollutant: methyl alcohol

TLV (ug/m3): 262000

Maximum Hourly Emission Rate (lbs/hr): 3.5

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 258 (EF45) and 233 (EF76)

MAGLC (ug/m3): 26200

Pollutant: methylamyl alcohol

TLV (ug/m3): 104000

Maximum Hourly Emission Rate (lbs/hr): 0.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 13 (EF45) and 11 (EF76)

MAGLC (ug/m3): 10400

Pollutant: methylene chloride

TLV (ug/m3): 174000

Maximum Hourly Emission Rate (lbs/hr): 32.4

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2372 (EF45) and 2141 (EF76)

MAGLC (ug/m3): 17400

Pollutant: methyl tert butyl ether

TLV (ug/m3): 144000

Maximum Hourly Emission Rate (lbs/hr): 19.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1405 (EF45) and 1269 (EF76)

MAGLC (ug/m3): 14400

Pollutant: pyridine

TLV (ug/m3): 16000

Maximum Hourly Emission Rate (lbs/hr): 1.4

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 105 (EF45) and 95 (EF76)

MAGLC (ug/m3): 1600

Pollutant: tetrahydrofuran

TLV (ug/m3): 590000

Maximum Hourly Emission Rate (lbs/hr): 10.1

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 743 (EF45) and 670 (EF76)

MAGLC (ug/m3): 59000

Pollutant: toluene

TLV (ug/m3): 188000

Maximum Hourly Emission Rate (lbs/hr): 2.3

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 168 (EF45) and 151 (EF76)

MAGLC (ug/m3): 18800

* Emissions unit will discharge through either egress point EF45 or EF76, but not both simultaneously.

Physical changes to or changes in the method of operation of the emissions unit after its installation 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 be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

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

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

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

2. The permittee shall sum the predicted 1-hour maximum ground-level concentrations for each pollutant from emissions units P007 through P015, P018 through P020, and P024 through P036, to demonstrate compliance with the "Air Toxic Policy". This sum shall take into account the actual equipment's operating schedule and equipment utilization. Comparison of the sum to the MAGLC shall be made to demonstrate compliance with the "Air Toxic Policy".

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0243000241 Emissions Unit ID: P008 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
Perforated basket centrifuge, SS, 32 inches, S-1900	OAC rule 3745-21-07(G)(2)	See A.I.2.a below.
	OAC rule 3745-31-05(A)(3) PTI 02-13904	See A.I.2.b and A.I.2.c below.
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).

2. Additional Terms and Conditions

- a. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day nor more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01. Emissions of organic materials from cleanup with photochemically reactive materials shall be included in the calculation of actual emissions when determining compliance with the 8 pounds per hour and 40 pounds per day limits.
- b. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are not employed, applied, evaporated, or dried, the permittee shall emit no more than 50 (fifty) pounds per hour of organic compounds.
- c. The emissions of organic compounds from emissions units P007 through P015, P018 through P020, and P024 through P036, combined, shall be limited to 75 (seventy five) tons per year.

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II. **Operational Restrictions**

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall keep the following daily records for all materials used in this emissions unit:
 - a. the identification of the chemical compound and its physical state; and
 - b. for any liquid organic materials, whether or not each material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall develop an emission factor for the total amount of organic compounds emitted for each final product generated in this emissions unit. The emission factors shall be in units of pounds of organic compounds emitted per pound of final product generated. The permittee shall indicate whether or not each emission factor is based upon the use of any photochemically reactive materials. The permittee's calculation of each emission factor shall be subject to the review and approval of the Ohio EPA Northeast District Office.
3. The permittee shall collect and record the following information for each final product generated in this emissions unit:
 - a. the company identification for each final product generated;
 - b. whether or not any photochemically reactive materials were used to generate each final product;
 - c. the quantity of each final product generated, in pounds;
 - d. the emission factor for each final product generated, in pounds of organic compounds emitted per pound of final product generated;
 - e. the number of days the emissions unit was in operation to generate each final product; and
 - f. the average daily organic compound emission rate, in pounds per day (c x d)/e.
4. The permittee shall collect and record the following information each day for all final products generated in this emissions unit:
 - a. For each day during which any photochemically reactive material was used as a cleanup material and/or for one or more of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from $i = 1$ to $i = n$, of A.III.3.f).
 - b. For each day during which no photochemically reactive material was used as a cleanup material and/or for any of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from $i = 1$ to $i = n$, of A.III.3.f).
5. The permittee shall collect and record the following information for the cleanup materials employed each day in this emissions unit:
 - a. the company identification for each cleanup material;
 - b. whether or not each cleanup material is a photochemically reactive material;
 - c. the quantity of each cleanup material employed that is a photochemically reactive material, in gallons;
 - d. the OC content of each cleanup material employed that is a photochemically reactive material, in pounds per gallon;
 - e. the quantity of each cleanup material employed that is not a photochemically reactive material, in gallons;
 - f. the OC content of each cleanup material employed that is not a photochemically reactive material, in pounds per gallon;
 - g. the daily emissions of the cleanup materials that are photochemically reactive materials, in pounds per day (the summation, from $i = 1$ to $i = n$ of c x d);
 - h. the daily emissions of the cleanup materials that are not photochemically reactive materials, in pounds per day (the summation, from $i = 1$ to $i = n$ of e x f); and
 - i. the total daily OC emissions from all cleanup materials, in pounds per day (g + h).
6. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the number of hours of operation;
 - b. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per day (A.III.5.g + A.III.4.a);
 - c. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the average hourly emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per hour (A.III.6.b/A.III.6.a);
 - d. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are not photochemically reactive materials, in pounds per day (A.III.5.h);

- e. for each day during which no photochemically reactive material was used for any of the final products and/or any of the cleanup materials, the total daily emissions from all final products and all cleanup materials, in pounds per day (A.III.5.h + A.III.4.b);
 - f. for each day during which no photochemically reactive material was used for any of the final products and/or any of the cleanup materials, the average hourly emissions from all final products and all cleanup materials, in pounds per hour (A.III.6.e/ A.III.6.a); and
 - g. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions for all final products and all cleanup materials, in pounds per day (A.III.6.b + A.III.6.d).
7. The permittee shall record annually the OC emissions from this emissions unit and from emissions units P007 through P015, P018 through P020, and P024 through P036, combined. The annual emission (in tons) for this emissions unit shall be calculated by summing the values from A.III.6.e and A.III.6.g for the entire calendar year and then dividing by 2000.

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IV. Reporting Requirements

- 1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 8 pounds per hour, and the actual average organic compound emission rate for each such day.
 - b. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - c. For the days during which no photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the emissions unit exceeded 50 pounds per hour, and the actual organic compound emission rate for each such day.
- 2. Each year, the permittee shall submit an annual report, by March 31, for the preceding calendar year. Each annual report shall specify the annual OC emissions for this emissions unit and for emissions units P007 through P015, P018 through P020, and P024 through P036, combined.

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V. Testing Requirements

- 1. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.
- 2. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.
- 3. Emission Limitation: On the days that no photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit no more than 50 (fifty) pounds per hour of organic compounds.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.
- 4. Emission Limitation: 75 tons OC per year from emissions units P007 through P015, P018 through P020, and P024 through P036, combined.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.
- 5. Formulation data shall be used to determine the organic compound contents of the materials employed for each final product and each cleanup material.

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0243000241 Issuance type: Title V Draft Permit

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Facility ID: 0243000241 Emissions Unit ID: P008 Issuance type: Title V Draft Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
Perforated basket centrifuge, SS, 32 inches, S-1900	None	None

2. Additional Terms and Conditions

1. None

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit (P008) was evaluated based on the actual materials employed and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant potentially emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each of the potential pollutants discharges from P008:

Pollutant: acetic acid
 TLV (ug/m3): 25000
 Maximum Hourly Emission Rate (lbs/hr): 1.3
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3)*: 94 (EF45) and 85 (EF76)
 MAGLC (ug/m3): 2500

Pollutant: acetone
 TLV (ug/m3): 1188000
 Maximum Hourly Emission Rate (lbs/hr): 18.4
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1347 (EF45) and 1216 (EF76)
 MAGLC (ug/m3): 118800

Pollutant: acetonitrile
 TLV (ug/m3): 67000
 Maximum Hourly Emission Rate (lbs/hr): 5.1
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 376 (EF45) and 339 (EF76)
 MAGLC (ug/m3): 6700

Pollutant: cyclohexane
 TLV (ug/m3): 1030000
 Maximum Hourly Emission Rate (lbs/hr): 11.4
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 836 (EF45) and 755 (EF76)
 MAGLC (ug/m3): 103000

Pollutant: dimethylformamide
 TLV (ug/m3): 30000

Maximum Hourly Emission Rate (lbs/hr): 0.4
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 30 (EF45) and 27 (EF76)
 MAGLC (ug/m3): 3000

Pollutant: ethyl acetate
 TLV (ug/m3): 1440000
 Maximum Hourly Emission Rate (lbs/hr): 11.3
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 826 (EF45) and 745 (EF76)
 MAGLC (ug/m3): 144000

Pollutant: ethyl alcohol
 TLV (ug/m3): 1880000
 Maximum Hourly Emission Rate (lbs/hr): 3.8
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 275 (EF45) and 249 (EF76)
 MAGLC (ug/m3): 188000

Pollutant: heptane
 TLV (ug/m3): 1640000
 Maximum Hourly Emission Rate (lbs/hr): 6.3
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 458 (EF45) and 414 (EF76)
 MAGLC (ug/m3): 164000

Pollutant: isopropyl acetate
 TLV (ug/m3): 1044000
 Maximum Hourly Emission Rate (lbs/hr): 8.5
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 620 (EF45) and 560 (EF76)
 MAGLC (ug/m3): 104400

Pollutant: isopropyl alcohol
 TLV (ug/m3): 983000
 Maximum Hourly Emission Rate (lbs/hr): 3.8
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 275 (EF45) and 248 (EF76)
 MAGLC (ug/m3): 98300

Pollutant: methyl alcohol
 TLV (ug/m3): 262000
 Maximum Hourly Emission Rate (lbs/hr): 5.6
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 407 (EF45) and 367 (EF76)
 MAGLC (ug/m3): 26200

Pollutant: methylamyl alcohol
 TLV (ug/m3): 104000
 Maximum Hourly Emission Rate (lbs/hr): 0.3
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 20 (EF45) and 18 (EF76)
 MAGLC (ug/m3): 10400

Pollutant: methylene chloride
 TLV (ug/m3): 174000
 Maximum Hourly Emission Rate (lbs/hr): 29.2
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2138 (EF45) and 1930 (EF76)
 MAGLC (ug/m3): 17400

Pollutant: methyl tert butyl ether
 TLV (ug/m3): 144000
 Maximum Hourly Emission Rate (lbs/hr): 30.3
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2217 (EF45) and 2001 (EF76)
 MAGLC (ug/m3): 14400

Pollutant: pyridine
 TLV (ug/m3): 16000
 Maximum Hourly Emission Rate (lbs/hr): 2.3
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 165 (EF45) and 149 (EF76)
 MAGLC (ug/m3): 1600

Pollutant: tetrahydrofuran
 TLV (ug/m3): 590000
 Maximum Hourly Emission Rate (lbs/hr): 16.0
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1171 (EF45) and 1057 (EF76)
 MAGLC (ug/m3): 59000

Pollutant: toluene
 TLV (ug/m3): 188000
 Maximum Hourly Emission Rate (lbs/hr): 3.6
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 264 (EF45) and 239 (EF76)
 MAGLC (ug/m3): 18800

* Emissions unit will discharge through either egress point EF45 or EF76, but not both simultaneously.

Physical changes to or changes in the method of operation of the emissions unit after its installation 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 be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental

Industrial Hygienists (ACGIH)", than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

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

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

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

2. The permittee shall sum the predicted 1-hour maximum ground-level concentrations for each pollutant from emissions units P007 through P015, P018 through P020, and P024 through P036, to demonstrate compliance with the "Air Toxic Policy". This sum shall take into account the actual equipment's operating schedule and equipment utilization. Comparison of the sum to the MAGLC shall be made to demonstrate compliance with the "Air Toxic Policy".

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0243000241 Emissions Unit ID: P009 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
Pressure filter, SS, 36 inches, S-9300	OAC rule 3745-21-07(G)(2)	See A.I.2.a below.

OAC rule 3745-31-05(A)(3)
PTI 02-13904

See A.I.2.b and A.I.2.c below.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).

2. Additional Terms and Conditions

- a. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day nor more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01. Emissions of organic materials from cleanup with photochemically reactive materials shall be included in the calculation of actual emissions when determining compliance with the 8 pounds per hour and 40 pounds per day limits.
- b. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are not employed, applied, evaporated, or dried, the permittee shall emit no more than 50 (fifty) pounds per hour of organic compounds.
- c. The emissions of organic compounds from emissions units P007 through P015, P018 through P020, and P024 through P036, combined, shall be limited to 75 (seventy five) tons per year.

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall keep the following daily records for all materials used in this emissions unit:
 - a. the identification of the chemical compound and its physical state; and
 - b. for any liquid organic materials, whether or not each material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall develop an emission factor for the total amount of organic compounds emitted for each final product generated in this emissions unit. The emission factors shall be in units of pounds of organic compounds emitted per pound of final product generated. The permittee shall indicate whether or not each emission factor is based upon the use of any photochemically reactive materials. The permittee's calculation of each emission factor shall be subject to the review and approval of the Ohio EPA Northeast District Office.
3. The permittee shall collect and record the following information for each final product generated in this emissions unit:
 - a. the company identification for each final product generated;
 - b. whether or not any photochemically reactive materials were used to generate each final product;
 - c. the quantity of each final product generated, in pounds;
 - d. the emission factor for each final product generated, in pounds of organic compounds emitted per pound of final product generated;
 - e. the number of days the emissions unit was in operation to generate each final product; and
 - f. the average daily organic compound emission rate, in pounds per day (c x d)/e.
4. The permittee shall collect and record the following information each day for all final products generated in this emissions unit:
 - a. For each day during which any photochemically reactive material was used as a cleanup material and/or for one or more of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from i = 1 to i = n, of A.III.3.f).
 - b. For each day during which no photochemically reactive material was used as a cleanup material and/or for any of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from i = 1 to i = n, of A.III.3.f).
5. The permittee shall collect and record the following information for the cleanup materials employed each day in this emissions unit:
 - a. the company identification for each cleanup material;
 - b. whether or not each cleanup material is a photochemically reactive material;
 - c. the quantity of each cleanup material employed that is a photochemically reactive material, in gallons;
 - d. the OC content of each cleanup material employed that is a photochemically reactive material, in pounds

- per gallon;
- e. the quantity of each cleanup material employed that is not a photochemically reactive material, in gallons;
 - f. the OC content of each cleanup material employed that is not a photochemically reactive material, in pounds per gallon;
 - g. the daily emissions of the cleanup materials that are photochemically reactive materials, in pounds per day (the summation, from $i = 1$ to $i = n$ of $c \times d$);
 - h. the daily emissions of the cleanup materials that are not photochemically reactive materials, in pounds per day (the summation, from $i = 1$ to $i = n$ of $e \times f$); and
 - i. the total daily OC emissions from all cleanup materials, in pounds per day ($g + h$).
6. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the number of hours of operation;
 - b. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per day (A.III.5.g + A.III.4.a);
 - c. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the average hourly emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per hour (A.III.6.b/A.III.6.a);
 - d. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are not photochemically reactive materials, in pounds per day (A.III.5.h);
 - e. for each day during which no photochemically reactive material was used for any of the final products and/or any of the cleanup materials, the total daily emissions from all final products and all cleanup materials, in pounds per day (A.III.5.h + A.III.4.b);
 - f. for each day during which no photochemically reactive material was used for any of the final products and/or any of the cleanup materials, the average hourly emissions from all final products and all cleanup materials, in pounds per hour (A.III.6.e/ A.III.6.a); and
 - g. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions for all final products and all cleanup materials, in pounds per day (A.III.6.b + A.III.6.d).
 7. The permittee shall record annually the OC emissions from this emissions unit and from emissions units P007 through P015, P018 through P020, and P024 through P036, combined. The annual emission (in tons) for this emissions unit shall be calculated by summing the values from A.III.6.e and A.III.6.g for the entire calendar year and then dividing by 2000.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 8 pounds per hour, and the actual average organic compound emission rate for each such day.
 - b. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - c. For the days during which no photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the emissions unit exceeded 50 pounds per hour, and the actual organic compound emission rate for each such day.
2. Each year, the permittee shall submit an annual report, by March 31, for the preceding calendar year. Each annual report shall specify the annual OC emissions for this emissions unit and for emissions units P007 through P015, P018 through P020, and P024 through P036, combined.

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V. Testing Requirements

1. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.
2. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 8 (eight) pounds per

hour of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.

3. Emission Limitation: On the days that no photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit no more than 50 (fifty) pounds per hour of organic compounds.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.

4. Emission Limitation: 75 tons OC per year from emissions units P007 through P015, P018 through P020, and P024 through P036, combined.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.

5. Formulation data shall be used to determine the organic compound contents of the materials employed for each final product and each cleanup material.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0243000241 Emissions Unit ID: P009 Issuance type: Title V Draft Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
2. Additional Terms and Conditions			
1.	None	None	None

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II. **Operational Restrictions**

1. None

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

1. The permit to install for this emissions unit (P009) was evaluated based on the actual materials employed and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant potentially emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the

Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each of the potential pollutants discharges from P009:

Pollutant: acetic acid
TLV (ug/m3): 25000
Maximum Hourly Emission Rate (lbs/hr): 0.5
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3)*: 39 (EF45) and 35 (EF76)
MAGLC (ug/m3): 2500

Pollutant: acetone
TLV (ug/m3): 1188000
Maximum Hourly Emission Rate (lbs/hr): 32.9
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2409 (EF45) and 2174 (EF76)
MAGLC (ug/m3): 118800

Pollutant: acetonitrile
TLV (ug/m3): 67000
Maximum Hourly Emission Rate (lbs/hr): 2.1
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 156 (EF45) and 141 (EF76)
MAGLC (ug/m3): 6700

Pollutant: cyclohexane
TLV (ug/m3): 1030000
Maximum Hourly Emission Rate (lbs/hr): 4.7
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 347 (EF45) and 313 (EF76)
MAGLC (ug/m3): 103000

Pollutant: dimethylformamide
TLV (ug/m3): 30000
Maximum Hourly Emission Rate (lbs/hr): 0.2
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 12 (EF45) and 11 (EF76)
MAGLC (ug/m3): 3000

Pollutant: ethyl acetate
TLV (ug/m3): 1440000
Maximum Hourly Emission Rate (lbs/hr): 4.7
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 343 (EF45) and 309 (EF76)
MAGLC (ug/m3): 144000

Pollutant: ethyl alcohol
TLV (ug/m3): 1880000
Maximum Hourly Emission Rate (lbs/hr): 1.6
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 114 (EF45) and 103 (EF76)
MAGLC (ug/m3): 188000

Pollutant: heptane
TLV (ug/m3): 1640000
Maximum Hourly Emission Rate (lbs/hr): 2.6
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 190 (EF45) and 172 (EF76)
MAGLC (ug/m3): 164000

Pollutant: isopropyl acetate
TLV (ug/m3): 1044000
Maximum Hourly Emission Rate (lbs/hr): 3.5
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 257 (EF45) and 232 (EF76)
MAGLC (ug/m3): 104400

Pollutant: isopropyl alcohol
TLV (ug/m3): 983000
Maximum Hourly Emission Rate (lbs/hr): 1.6
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 114 (EF45) and 103 (EF76)
MAGLC (ug/m3): 98300

Pollutant: methyl alcohol
TLV (ug/m3): 262000
Maximum Hourly Emission Rate (lbs/hr): 2.3
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 169 (EF45) and 152 (EF76)
MAGLC (ug/m3): 26200

Pollutant: methylamyl alcohol
TLV (ug/m3): 104000
Maximum Hourly Emission Rate (lbs/hr): 0.1
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 8 (EF45) and 7 (EF76)
MAGLC (ug/m3): 10400

Pollutant: methylene chloride
TLV (ug/m3): 174000
Maximum Hourly Emission Rate (lbs/hr): 21.2
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1552 (EF45) and 1401 (EF76)
MAGLC (ug/m3): 17400

Pollutant: methyl tert butyl ether
TLV (ug/m3): 144000
Maximum Hourly Emission Rate (lbs/hr): 12.6
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 920 (EF45) and 830 (EF76)
MAGLC (ug/m3): 14400

Pollutant: pyridine

TLV (ug/m3): 16000

Maximum Hourly Emission Rate (lbs/hr): 0.9
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 69 (EF45) and 62 (EF76)
 MAGLC (ug/m3): 1600

Pollutant: tetrahydrofuran
 TLV (ug/m3): 590000
 Maximum Hourly Emission Rate (lbs/hr): 6.6
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 486 (EF45) and 439 (EF76)
 MAGLC (ug/m3): 59000

Pollutant: toluene
 TLV (ug/m3): 188000
 Maximum Hourly Emission Rate (lbs/hr): 1.5
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 110 (EF45) and 99 (EF76)
 MAGLC (ug/m3): 18800

* Emissions unit will discharge through either egress point EF45 or EF76, but not both simultaneously.

Physical changes to or changes in the method of operation of the emissions unit after its installation 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 be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
 If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
2. The permittee shall sum the predicted 1-hour maximum ground-level concentrations for each pollutant from emissions units P007 through P015, P018 through P020, and P024 through P036, to demonstrate compliance with the "Air Toxic Policy". This sum shall take into account the actual equipment's operating schedule and equipment utilization. Comparison of the sum to the MAGLC shall be made to demonstrate compliance with the "Air Toxic Policy".

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0243000241 Emissions Unit ID: P010 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
Pressure filter, SS, 30 inches, S-8400	OAC rule 3745-21-07(G)(2) OAC rule 3745-31-05(A)(3) PTI 02-13904	See A.I.2.a below. See A.I.2.b and A.I.2.c below.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).

2. Additional Terms and Conditions

- a. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day nor more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01. Emissions of organic materials from cleanup with photochemically reactive materials shall be included in the calculation of actual emissions when determining compliance with the 8 pounds per hour and 40 pounds per day limits.
- b. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are not employed, applied, evaporated, or dried, the permittee shall emit no more than 50 (fifty) pounds per hour of organic compounds.
- c. The emissions of organic compounds from emissions units P007 through P015, P018 through P020, and P024 through P036, combined, shall be limited to 75 (seventy five) tons per year.

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall keep the following daily records for all materials used in this emissions unit:
 - a. the identification of the chemical compound and its physical state; and
 - b. for any liquid organic materials, whether or not each material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall develop an emission factor for the total amount of organic compounds emitted for each final product generated in this emissions unit. The emission factors shall be in units of pounds of organic compounds emitted per pound of final product generated. The permittee shall indicate whether or not each emission factor is based upon the use of any photochemically reactive materials. The permittee's calculation of each emission factor shall be subject to the review and approval of the Ohio EPA Northeast District Office.
3. The permittee shall collect and record the following information for each final product generated in this emissions unit:
 - a. the company identification for each final product generated;
 - b. whether or not any photochemically reactive materials were used to generate each final product;
 - c. the quantity of each final product generated, in pounds;

- d. the emission factor for each final product generated, in pounds of organic compounds emitted per pound of final product generated;
 - e. the number of days the emissions unit was in operation to generate each final product; and
 - f. the average daily organic compound emission rate, in pounds per day $(c \times d)/e$.
4. The permittee shall collect and record the following information each day for all final products generated in this emissions unit:
 - a. For each day during which any photochemically reactive material was used as a cleanup material and/or for one or more of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from $i = 1$ to $i = n$, of A.III.3.f).
 - b. For each day during which no photochemically reactive material was used as a cleanup material and/or for any of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from $i = 1$ to $i = n$, of A.III.3.f).
 5. The permittee shall collect and record the following information for the cleanup materials employed each day in this emissions unit:
 - a. the company identification for each cleanup material;
 - b. whether or not each cleanup material is a photochemically reactive material;
 - c. the quantity of each cleanup material employed that is a photochemically reactive material, in gallons;
 - d. the OC content of each cleanup material employed that is a photochemically reactive material, in pounds per gallon;
 - e. the quantity of each cleanup material employed that is not a photochemically reactive material, in gallons;
 - f. the OC content of each cleanup material employed that is not a photochemically reactive material, in pounds per gallon;
 - g. the daily emissions of the cleanup materials that are photochemically reactive materials, in pounds per day (the summation, from $i = 1$ to $i = n$ of $c \times d$);
 - h. the daily emissions of the cleanup materials that are not photochemically reactive materials, in pounds per day (the summation, from $i = 1$ to $i = n$ of $e \times f$); and
 - i. the total daily OC emissions from all cleanup materials, in pounds per day $(g + h)$.
 6. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the number of hours of operation;
 - b. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per day $(A.III.5.g + A.III.4.a)$;
 - c. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the average hourly emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per hour $(A.III.6.b/A.III.6.a)$;
 - d. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are not photochemically reactive materials, in pounds per day $(A.III.5.h)$;
 - e. for each day during which no photochemically reactive material was used for any of the final products and/or any of the cleanup materials, the total daily emissions from all final products and all cleanup materials, in pounds per day $(A.III.5.h + A.III.4.b)$;
 - f. for each day during which no photochemically reactive material was used for any of the final products and/or any of the cleanup materials, the average hourly emissions from all final products and all cleanup materials, in pounds per hour $(A.III.6.e/ A.III.6.a)$; and
 - g. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions for all final products and all cleanup materials, in pounds per day $(A.III.6.b + A.III.6.d)$.
 7. The permittee shall record annually the OC emissions from this emissions unit and from emissions units P007 through P015, P018 through P020, and P024 through P036, combined. The annual emission (in tons) for this emissions unit shall be calculated by summing the values from A.III.6.e and A.III.6.g for the entire calendar year and then dividing by 2000.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 8 pounds per

hour, and the actual average organic compound emission rate for each such day.

- b. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - c. For the days during which no photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the emissions unit exceeded 50 pounds per hour, and the actual organic compound emission rate for each such day.
2. Each year, the permittee shall submit an annual report, by March 31, for the preceding calendar year. Each annual report shall specify the annual OC emissions for this emissions unit and for emissions units P007 through P015, P018 through P020, and P024 through P036, combined.

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V. Testing Requirements

1. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.
2. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.
3. Emission Limitation: On the days that no photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit no more than 50 (fifty) pounds per hour of organic compounds.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.
4. Emission Limitation: 75 tons OC per year from emissions units P007 through P015, P018 through P020, and P024 through P036, combined.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.
5. Formulation data shall be used to determine the organic compound contents of the materials employed for each final product and each cleanup material.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0243000241 Issuance type: Title V Draft Permit

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Facility ID: 0243000241 Emissions Unit ID: P010 Issuance type: Title V Draft Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
2.	Pressure filter, SS, 30 inches, S-8400	None	None
	Additional Terms and Conditions		
1.	None		

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit (P010) was evaluated based on the actual materials employed and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant potentially emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each of the potential pollutants discharges from P010:

Pollutant: acetic acid
 TLV (ug/m3): 25000
 Maximum Hourly Emission Rate (lbs/hr): 0.3
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3)*: 23 (EF45) and 21 (EF76)
 MAGLC (ug/m3): 2500

Pollutant: acetone
 TLV (ug/m3): 1188000
 Maximum Hourly Emission Rate (lbs/hr): 19.7
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1442 (EF45) and 1302 (EF76)
 MAGLC (ug/m3): 118800

Pollutant: acetonitrile
 TLV (ug/m3): 67000
 Maximum Hourly Emission Rate (lbs/hr): 1.3
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 93 (EF45) and 84 (EF76)
 MAGLC (ug/m3): 6700

Pollutant: cyclohexane
 TLV (ug/m3): 1030000
 Maximum Hourly Emission Rate (lbs/hr): 2.8
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 208 (EF45) and 188 (EF76)
 MAGLC (ug/m3): 103000

Pollutant: dimethylformamide
 TLV (ug/m3): 30000
 Maximum Hourly Emission Rate (lbs/hr): 0.1
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 7 (EF45) and 7 (EF76)
 MAGLC (ug/m3): 3000

Pollutant: ethyl acetate
 TLV (ug/m3): 1440000
 Maximum Hourly Emission Rate (lbs/hr): 2.8
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 205 (EF45) and 185 (EF76)
 MAGLC (ug/m3): 144000

Pollutant: ethyl alcohol
 TLV (ug/m3): 1880000
 Maximum Hourly Emission Rate (lbs/hr): 0.9
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 68 (EF45) and 62 (EF76)
 MAGLC (ug/m3): 188000

Pollutant: heptane
 TLV (ug/m3): 1640000
 Maximum Hourly Emission Rate (lbs/hr): 1.6
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 114 (EF45) and 103 (EF76)
 MAGLC (ug/m3): 164000

Pollutant: isopropyl acetate
 TLV (ug/m3): 1040000
 Maximum Hourly Emission Rate (lbs/hr): 2.1
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 154 (EF45) and 139 (EF76)
 MAGLC (ug/m3): 104000

Pollutant: isopropyl alcohol

TLV (ug/m3): 983000

Maximum Hourly Emission Rate (lbs/hr): 0.9

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 68 (EF45) and 62 (EF76)

MAGLC (ug/m3): 98300

Pollutant: methyl alcohol

TLV (ug/m3): 262000

Maximum Hourly Emission Rate (lbs/hr): 1.4

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 101 (EF45) and 91 (EF76)

MAGLC (ug/m3): 26200

Pollutant: methylamyl alcohol

TLV (ug/m3): 104000

Maximum Hourly Emission Rate (lbs/hr): 0.1

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 5 (EF45) and 4 (EF76)

MAGLC (ug/m3): 10400

Pollutant: methylene chloride

TLV (ug/m3): 174000

Maximum Hourly Emission Rate (lbs/hr): 12.7

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 930 (EF45) and 839 (EF76)

MAGLC (ug/m3): 17400

Pollutant: methyl tert butyl ether

TLV (ug/m3): 144000

Maximum Hourly Emission Rate (lbs/hr): 7.5

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 551 (EF45) and 497 (EF76)

MAGLC (ug/m3): 14400

Pollutant: pyridine

TLV (ug/m3): 16000

Maximum Hourly Emission Rate (lbs/hr): 0.6

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 41 (EF45) and 37 (EF76)

MAGLC (ug/m3): 1600

Pollutant: tetrahydrofuran

TLV (ug/m3): 590000

Maximum Hourly Emission Rate (lbs/hr): 4.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 291 (EF45) and 263 (EF76)

MAGLC (ug/m3): 59000

Pollutant: toluene

TLV (ug/m3): 188000

Maximum Hourly Emission Rate (lbs/hr): 0.9

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 66 (EF45) and 59 (EF76)

MAGLC (ug/m3): 18800

* Emissions unit will discharge through either egress point EF45 or EF76, but not both simultaneously.

Physical changes to or changes in the method of operation of the emissions unit after its installation 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 be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

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

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

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

2. The permittee shall sum the predicted 1-hour maximum ground-level concentrations for each pollutant from emissions units P007 through P015, P018 through P020, and P024 through P036, to demonstrate compliance with the "Air Toxic Policy". This sum shall take into account the actual equipment's operating schedule and equipment utilization. Comparison of the sum to the MAGLC shall be made to demonstrate

compliance with the "Air Toxic Policy".

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0243000241 Emissions Unit ID: P011 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
Vacuum shelf dryer, 48 square feet, D-1500	OAC rule 3745-21-07(G)(2) OAC rule 3745-31-05(A)(3) PTI 02-13904	See A.I.2.a below. See A.I.2.b and A.I.2.c below.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).

2. Additional Terms and Conditions

- a. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day nor more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01. Emissions of organic materials from cleanup with photochemically reactive materials shall be included in the calculation of actual emissions when determining compliance with the 8 pounds per hour and 40 pounds per day limits.
- b. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are not employed, applied, evaporated, or dried, the permittee shall emit no more than 50 (fifty) pounds per hour of organic compounds.
- c. The emissions of organic compounds from emissions units P007 through P015, P018 through P020, and P024 through P036, combined, shall be limited to 75 (seventy five) tons per year.

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II. **Operational Restrictions**

- 1. None

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

1. The permittee shall keep the following daily records for all materials used in this emissions unit:
 - a. the identification of the chemical compound and its physical state; and
 - b. for any liquid organic materials, whether or not each material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall develop an emission factor for the total amount of organic compounds emitted for each final product generated in this emissions unit. The emission factors shall be in units of pounds of organic compounds emitted per pound of final product generated. The permittee shall indicate whether or not each emission factor is based upon the use of any photochemically reactive materials. The permittee's calculation of each emission factor shall be subject to the review and approval of the Ohio EPA Northeast District Office.
3. The permittee shall collect and record the following information for each final product generated in this emissions unit:
 - a. the company identification for each final product generated;
 - b. whether or not any photochemically reactive materials were used to generate each final product;
 - c. the quantity of each final product generated, in pounds;
 - d. the emission factor for each final product generated, in pounds of organic compounds emitted per pound of final product generated;
 - e. the number of days the emissions unit was in operation to generate each final product; and
 - f. the average daily organic compound emission rate, in pounds per day (c x d)/e.
4. The permittee shall collect and record the following information each day for all final products generated in this emissions unit:
 - a. For each day during which any photochemically reactive material was used as a cleanup material and/or for one or more of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from $i = 1$ to $i = n$, of A.III.3.f).
 - b. For each day during which no photochemically reactive material was used as a cleanup material and/or for any of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from $i = 1$ to $i = n$, of A.III.3.f).
5. The permittee shall collect and record the following information for the cleanup materials employed each day in this emissions unit:
 - a. the company identification for each cleanup material;
 - b. whether or not each cleanup material is a photochemically reactive material;
 - c. the quantity of each cleanup material employed that is a photochemically reactive material, in gallons;
 - d. the OC content of each cleanup material employed that is a photochemically reactive material, in pounds per gallon;
 - e. the quantity of each cleanup material employed that is not a photochemically reactive material, in gallons;
 - f. the OC content of each cleanup material employed that is not a photochemically reactive material, in pounds per gallon;
 - g. the daily emissions of the cleanup materials that are photochemically reactive materials, in pounds per day (the summation, from $i = 1$ to $i = n$ of c x d);
 - h. the daily emissions of the cleanup materials that are not photochemically reactive materials, in pounds per day (the summation, from $i = 1$ to $i = n$ of e x f); and
 - i. the total daily OC emissions from all cleanup materials, in pounds per day (g + h).
6. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the number of hours of operation;
 - b. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per day (A.III.5.g + A.III.4.a);
 - c. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the average hourly emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per hour (A.III.6.b/A.III.6.a);
 - d. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are

- not photochemically reactive materials, in pounds per day (A.III.5.h);
- e. for each day during which no photochemically reactive material was used for any of the final products and/or any of the cleanup materials, the total daily emissions from all final products and all cleanup materials, in pounds per day (A.III.5.h + A.III.4.b);
 - f. for each day during which no photochemically reactive material was used for any of the final products and/or any of the cleanup materials, the average hourly emissions from all final products and all cleanup materials, in pounds per hour (A.III.6.e/ A.III.6.a); and
 - g. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions for all final products and all cleanup materials, in pounds per day (A.III.6.b + A.III.6.d).
7. The permittee shall record annually the OC emissions from this emissions unit and from emissions units P007 through P015, P018 through P020, and P024 through P036, combined. The annual emission (in tons) for this emissions unit shall be calculated by summing the values from A.III.6.e and A.III.6.g for the entire calendar year and then dividing by 2000.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 8 pounds per hour, and the actual average organic compound emission rate for each such day.
 - b. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - c. For the days during which no photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the emissions unit exceeded 50 pounds per hour, and the actual organic compound emission rate for each such day.
2. Each year, the permittee shall submit an annual report, by March 31, for the preceding calendar year. Each annual report shall specify the annual OC emissions for this emissions unit and for emissions units P007 through P015, P018 through P020, and P024 through P036, combined.

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V. Testing Requirements

1. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.
2. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.
3. Emission Limitation: On the days that no photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit no more than 50 (fifty) pounds per hour of organic compounds.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.
4. Emission Limitation: 75 tons OC per year from emissions units P007 through P015, P018 through P020, and P024 through P036, combined.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.
5. Formulation data shall be used to determine the organic compound contents of the materials employed for each final product and each cleanup material.

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0243000241 Emissions Unit ID: P011 Issuance type: Title V Draft Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
2. Vacuum shelf dryer, 48 square feet, D-1500	None	None
Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. The permit to install for this emissions unit (P011) was evaluated based on the actual materials employed and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant potentially emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each of the potential pollutants discharges from P011:

Pollutant: acetone
 TLV (ug/m3): 1188000
 Maximum Hourly Emission Rate (lbs/hr): 1.7
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3)*: 126 (EF45) and 114 (EF76)
 MAGLC (ug/m3): 118800

Pollutant: acetonitrile
 TLV (ug/m3): 67000
 Maximum Hourly Emission Rate (lbs/hr): 0.5
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 34 (EF45) and 30 (EF76)
 MAGLC (ug/m3): 6700

Pollutant: cyclohexane
 TLV (ug/m3): 1030000
 Maximum Hourly Emission Rate (lbs/hr): 1.0
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 73 (EF45) and 66 (EF76)
 MAGLC (ug/m3): 103000

Pollutant: dimethylformamide
 TLV (ug/m3): 30000
 Maximum Hourly Emission Rate (lbs/hr): 0.0
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2 (EF45) and 2 (EF76)
 MAGLC (ug/m3): 3000

Pollutant: ethyl acetate
 TLV (ug/m3): 1440000

Maximum Hourly Emission Rate (lbs/hr): 0.9

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 68 (EF45) and 61 (EF76)
MAGLC (ug/m3): 144000

Pollutant: ethyl alcohol

TLV (ug/m3): 1880000

Maximum Hourly Emission Rate (lbs/hr): 0.3

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 19 (EF45) and 17 (EF76)
MAGLC (ug/m3): 188000

Pollutant: heptane

TLV (ug/m3): 1640000

Maximum Hourly Emission Rate (lbs/hr): 0.5

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 37 (EF45) and 33 (EF76)
MAGLC (ug/m3): 164000

Pollutant: isopropyl alcohol

TLV (ug/m3): 983000

Maximum Hourly Emission Rate (lbs/hr): 0.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 17 (EF45) and 16 (EF76)
MAGLC (ug/m3): 98300

Pollutant: methyl alcohol

TLV (ug/m3): 262000

Maximum Hourly Emission Rate (lbs/hr): 0.4

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 31 (EF45) and 28 (EF76)
MAGLC (ug/m3): 26200

Pollutant: methylamyl alcohol

TLV (ug/m3): 104000

Maximum Hourly Emission Rate (lbs/hr): 0.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1 (EF45) and 1 (EF76)
MAGLC (ug/m3): 10400

Pollutant: methylene chloride

TLV (ug/m3): 174000

Maximum Hourly Emission Rate (lbs/hr): 5.1

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 373 (EF45) and 337 (EF76)
MAGLC (ug/m3): 17400

Pollutant: methyl tert butyl ether

TLV (ug/m3): 144000

Maximum Hourly Emission Rate (lbs/hr): 2.9

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 215 (EF45) and 194 (EF76)
MAGLC (ug/m3): 14400

Pollutant: pyridine

TLV (ug/m3): 16000

Maximum Hourly Emission Rate (lbs/hr): 0.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 12 (EF45) and 11 (EF76)
MAGLC (ug/m3): 1600

Pollutant: tetrahydrofuran

TLV (ug/m3): 590000

Maximum Hourly Emission Rate (lbs/hr): 1.5

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 107 (EF45) and 97 (EF76)
MAGLC (ug/m3): 59000

Pollutant: toluene

TLV (ug/m3): 188000

Maximum Hourly Emission Rate (lbs/hr): 0.3

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 21 (EF45) and 19 (EF76)
MAGLC (ug/m3): 18800

* Emissions unit will discharge through either egress point EF45 or EF76, but not both simultaneously.

Physical changes to or changes in the method of operation of the emissions unit after its installation 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 be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
2. The permittee shall sum the predicted 1-hour maximum ground-level concentrations for each pollutant from emissions units P007 through P015, P018 through P020, and P024 through P036, to demonstrate compliance with the "Air Toxic Policy". This sum shall take into account the actual equipment's operating schedule and equipment utilization. Comparison of the sum to the MAGLC shall be made to demonstrate compliance with the "Air Toxic Policy".

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0243000241 Emissions Unit ID: P012 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
Slant cone rotary dryer, 10 cubic feet, D-2000	OAC rule 3745-21-07(G)(2)	See A.I.2.a below.
	OAC rule 3745-31-05(A)(3) PTI 02-13904	See A.I.2.b and A.I.2.c below.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).

2. Additional Terms and Conditions

- a. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day nor more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01. Emissions of organic materials from cleanup with photochemically reactive materials shall be included

- in the calculation of actual emissions when determining compliance with the 8 pounds per hour and 40 pounds per day limits.
- b. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are not employed, applied, evaporated, or dried, the permittee shall emit no more than 50 (fifty) pounds per hour of organic compounds.
 - c. The emissions of organic compounds from emissions units P007 through P015, P018 through P020, and P024 through P036, combined, shall be limited to 75 (seventy five) tons per year.

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall keep the following daily records for all materials used in this emissions unit:
 - a. the identification of the chemical compound and its physical state; and
 - b. for any liquid organic materials, whether or not each material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall develop an emission factor for the total amount of organic compounds emitted for each final product generated in this emissions unit. The emission factors shall be in units of pounds of organic compounds emitted per pound of final product generated. The permittee shall indicate whether or not each emission factor is based upon the use of any photochemically reactive materials. The permittee's calculation of each emission factor shall be subject to the review and approval of the Ohio EPA Northeast District Office.
3. The permittee shall collect and record the following information for each final product generated in this emissions unit:
 - a. the company identification for each final product generated;
 - b. whether or not any photochemically reactive materials were used to generate each final product;
 - c. the quantity of each final product generated, in pounds;
 - d. the emission factor for each final product generated, in pounds of organic compounds emitted per pound of final product generated;
 - e. the number of days the emissions unit was in operation to generate each final product; and
 - f. the average daily organic compound emission rate, in pounds per day (c x d)/e.
4. The permittee shall collect and record the following information each day for all final products generated in this emissions unit:
 - a. For each day during which any photochemically reactive material was used as a cleanup material and/or for one or more of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from i = 1 to i = n, of A.III.3.f).
 - b. For each day during which no photochemically reactive material was used as a cleanup material and/or for any of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from i = 1 to i = n, of A.III.3.f).
5. The permittee shall collect and record the following information for the cleanup materials employed each day in this emissions unit:
 - a. the company identification for each cleanup material;
 - b. whether or not each cleanup material is a photochemically reactive material;
 - c. the quantity of each cleanup material employed that is a photochemically reactive material, in gallons;
 - d. the OC content of each cleanup material employed that is a photochemically reactive material, in pounds per gallon;
 - e. the quantity of each cleanup material employed that is not a photochemically reactive material, in gallons;
 - f. the OC content of each cleanup material employed that is not a photochemically reactive material, in pounds per gallon;
 - g. the daily emissions of the cleanup materials that are photochemically reactive materials, in pounds per day (the summation, from i = 1 to i = n of c x d);
 - h. the daily emissions of the cleanup materials that are not photochemically reactive materials, in pounds per

- day (the summation, from $i = 1$ to $i = n$ of $e \times f$); and
- i. the total daily OC emissions from all cleanup materials, in pounds per day ($g + h$).
6. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the number of hours of operation;
 - b. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per day (A.III.5.g + A.III.4.a);
 - c. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the average hourly emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per hour (A.III.6.b/A.III.6.a);
 - d. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are not photochemically reactive materials, in pounds per day (A.III.5.h);
 - e. for each day during which no photochemically reactive material was used for any of the final products and/or any of the cleanup materials, the total daily emissions from all final products and all cleanup materials, in pounds per day (A.III.5.h + A.III.4.b);
 - f. for each day during which no photochemically reactive material was used for any of the final products and/or any of the cleanup materials, the average hourly emissions from all final products and all cleanup materials, in pounds per hour (A.III.6.e/ A.III.6.a); and
 - g. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions for all final products and all cleanup materials, in pounds per day (A.III.6.b + A.III.6.d).
 7. The permittee shall record annually the OC emissions from this emissions unit and from emissions units P007 through P015, P018 through P020, and P024 through P036, combined. The annual emission (in tons) for this emissions unit shall be calculated by summing the values from A.III.6.e and A.III.6.g for the entire calendar year and then dividing by 2000.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 8 pounds per hour, and the actual average organic compound emission rate for each such day.
 - b. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - c. For the days during which no photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the emissions unit exceeded 50 pounds per hour, and the actual organic compound emission rate for each such day.
2. Each year, the permittee shall submit an annual report, by March 31, for the preceding calendar year. Each annual report shall specify the annual OC emissions for this emissions unit and for emissions units P007 through P015, P018 through P020, and P024 through P036, combined.

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V. Testing Requirements

1. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.
2. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.
3. Emission Limitation: On the days that no photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit no more than 50 (fifty) pounds per hour of organic compounds.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in

Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.

- 4. Emission Limitation: 75 tons OC per year from emissions units P007 through P015, P018 through P020, and P024 through P036, combined.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.

- 5. Formulation data shall be used to determine the organic compound contents of the materials employed for each final product and each cleanup material.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0243000241 Issuance type: Title V Draft Permit

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Facility ID: 0243000241 Emissions Unit ID: P012 Issuance type: Title V Draft Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
Slant cone rotary dryer, 10 cubic feet, D-2000	None	None

2. **Additional Terms and Conditions**

- 1. None

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II. **Operational Restrictions**

- 1. None

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

- 1. The permit to install for this emissions unit (P012) was evaluated based on the actual materials employed and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant potentially emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each of the potential pollutants discharges from P012:

Pollutant: acetone
 TLV (ug/m3): 1188000
 Maximum Hourly Emission Rate (lbs/hr): 2.3
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3)*: 169 (EF45) and 152 (EF76)
 MAGLC (ug/m3): 118800

Pollutant: acetonitrile

TLV (ug/m3): 67000
Maximum Hourly Emission Rate (lbs/hr): 0.6
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 45 (EF45) and 40 (EF76)
MAGLC (ug/m3): 6700
Pollutant: cyclohexane
TLV (ug/m3): 1030000
Maximum Hourly Emission Rate (lbs/hr): 1.3
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 97 (EF45) and 88 (EF76)
MAGLC (ug/m3): 103000

Pollutant: dimethylformamide

TLV (ug/m3): 30000
Maximum Hourly Emission Rate (lbs/hr): 0.0
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2 (EF45) and 2 (EF76)
MAGLC (ug/m3): 3000

Pollutant: ethyl acetate

TLV (ug/m3): 1440000
Maximum Hourly Emission Rate (lbs/hr): 1.2
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 91 (EF45) and 82 (EF76)
MAGLC (ug/m3): 144000

Pollutant: ethyl alcohol

TLV (ug/m3): 1880000
Maximum Hourly Emission Rate (lbs/hr): 0.3
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 25 (EF45) and 22 (EF76)
MAGLC (ug/m3): 188000

Pollutant: heptane

TLV (ug/m3): 1640000
Maximum Hourly Emission Rate (lbs/hr): 0.7
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 49 (EF45) and 44 (EF76)
MAGLC (ug/m3): 164000

Pollutant: isopropyl alcohol

TLV (ug/m3): 983000
Maximum Hourly Emission Rate (lbs/hr): 0.3
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 23 (EF45) and 21 (EF76)
MAGLC (ug/m3): 98300

Pollutant: methyl alcohol

TLV (ug/m3): 262000
Maximum Hourly Emission Rate (lbs/hr): 0.6
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 42 (EF45) and 38 (EF76)
MAGLC (ug/m3): 26200

Pollutant: methylamyl alcohol

TLV (ug/m3): 104000
Maximum Hourly Emission Rate (lbs/hr): 0.0
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1 (EF45) and 1 (EF76)
MAGLC (ug/m3): 10400

Pollutant: methylene chloride

TLV (ug/m3): 174000
Maximum Hourly Emission Rate (lbs/hr): 6.8
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 497 (EF45) and 449 (EF76)
MAGLC (ug/m3): 17400

Pollutant: methyl tert butyl ether

TLV (ug/m3): 144000
Maximum Hourly Emission Rate (lbs/hr): 3.9
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 286 (EF45) and 258 (EF76)
MAGLC (ug/m3): 14400

Pollutant: pyridine

TLV (ug/m3): 16000
Maximum Hourly Emission Rate (lbs/hr): 0.2
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 16 (EF45) and 14 (EF76)
MAGLC (ug/m3): 1600

Pollutant: tetrahydrofuran

TLV (ug/m3): 590000
Maximum Hourly Emission Rate (lbs/hr): 2.0
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 143 (EF45) and 129 (EF76)
MAGLC (ug/m3): 59000

Pollutant: toluene

TLV (ug/m3): 188000
Maximum Hourly Emission Rate (lbs/hr): 0.4
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 27 (EF45) and 25 (EF76)
MAGLC (ug/m3): 18800

* Emissions unit will discharge through either egress point EF45 or EF76, but not both simultaneously.

Physical changes to or changes in the method of operation of the emissions unit after its installation 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 be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
2. The permittee shall sum the predicted 1-hour maximum ground-level concentrations for each pollutant from emissions units P007 through P015, P018 through P020, and P024 through P036, to demonstrate compliance with the "Air Toxic Policy". This sum shall take into account the actual equipment's operating schedule and equipment utilization. Comparison of the sum to the MAGLC shall be made to demonstrate compliance with the "Air Toxic Policy".

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0243000241 Emissions Unit ID: P013 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
Double cone rotary dryer, 20 cubic feet, D-12000	OAC rule 3745-21-07(G)(2)	See A.I.2.a below.
	OAC rule 3745-31-05(A)(3) PTI 02-13904	See A.I.2.b and A.I.2.c below.
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).

2. Additional Terms and Conditions

- a. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day nor more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01. Emissions of organic materials from cleanup with photochemically reactive materials shall be included in the calculation of actual emissions when determining compliance with the 8 pounds per hour and 40 pounds per day limits.
- b. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are not employed, applied, evaporated, or dried, the permittee shall emit no more than 50 (fifty) pounds per hour of organic compounds.
- c. The emissions of organic compounds from emissions units P007 through P015, P018 through P020, and P024 through P036, combined, shall be limited to 75 (seventy five) tons per year.

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall keep the following daily records for all materials used in this emissions unit:
 - a. the identification of the chemical compound and its physical state; and
 - b. for any liquid organic materials, whether or not each material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall develop an emission factor for the total amount of organic compounds emitted for each final product generated in this emissions unit. The emission factors shall be in units of pounds of organic compounds emitted per pound of final product generated. The permittee shall indicate whether or not each emission factor is based upon the use of any photochemically reactive materials. The permittee's calculation of each emission factor shall be subject to the review and approval of the Ohio EPA Northeast District Office.
3. The permittee shall collect and record the following information for each final product generated in this emissions unit:
 - a. the company identification for each final product generated;
 - b. whether or not any photochemically reactive materials were used to generate each final product;
 - c. the quantity of each final product generated, in pounds;
 - d. the emission factor for each final product generated, in pounds of organic compounds emitted per pound of final product generated;
 - e. the number of days the emissions unit was in operation to generate each final product; and
 - f. the average daily organic compound emission rate, in pounds per day (c x d)/e.
4. The permittee shall collect and record the following information each day for all final products generated in this emissions unit:
 - a. For each day during which any photochemically reactive material was used as a cleanup material and/or for one or more of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from $i = 1$ to $i = n$, of A.III.3.f).
 - b. For each day during which no photochemically reactive material was used as a cleanup material and/or for any of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from $i = 1$ to $i = n$, of A.III.3.f).
5. The permittee shall collect and record the following information for the cleanup materials employed each day

in this emissions unit:

- a. the company identification for each cleanup material;
 - b. whether or not each cleanup material is a photochemically reactive material;
 - c. the quantity of each cleanup material employed that is a photochemically reactive material, in gallons;
 - d. the OC content of each cleanup material employed that is a photochemically reactive material, in pounds per gallon;
 - e. the quantity of each cleanup material employed that is not a photochemically reactive material, in gallons;
 - f. the OC content of each cleanup material employed that is not a photochemically reactive material, in pounds per gallon;
 - g. the daily emissions of the cleanup materials that are photochemically reactive materials, in pounds per day (the summation, from $i = 1$ to $i = n$ of $c \times d$);
 - h. the daily emissions of the cleanup materials that are not photochemically reactive materials, in pounds per day (the summation, from $i = 1$ to $i = n$ of $e \times f$); and
 - i. the total daily OC emissions from all cleanup materials, in pounds per day ($g + h$).
6. The permittee shall collect and record the following information each day for this emissions unit:
- a. the number of hours of operation;
 - b. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per day (A.III.5.g + A.III.4.a);
 - c. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the average hourly emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per hour (A.III.6.b/A.III.6.a);
 - d. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are not photochemically reactive materials, in pounds per day (A.III.5.h);
 - e. for each day during which no photochemically reactive material was used for any of the final products and/or any of the cleanup materials, the total daily emissions from all final products and all cleanup materials, in pounds per day (A.III.5.h + A.III.4.b);
 - f. for each day during which no photochemically reactive material was used for any of the final products and/or any of the cleanup materials, the average hourly emissions from all final products and all cleanup materials, in pounds per hour (A.III.6.e/ A.III.6.a); and
 - g. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions for all final products and all cleanup materials, in pounds per day (A.III.6.b + A.III.6.d).
7. The permittee shall record annually the OC emissions from this emissions unit and from emissions units P007 through P015, P018 through P020, and P024 through P036, combined. The annual emission (in tons) for this emissions unit shall be calculated by summing the values from A.III.6.e and A.III.6.g for the entire calendar year and then dividing by 2000.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 8 pounds per hour, and the actual average organic compound emission rate for each such day.
 - b. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - c. For the days during which no photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the emissions unit exceeded 50 pounds per hour, and the actual organic compound emission rate for each such day.
2. Each year, the permittee shall submit an annual report, by March 31, for the preceding calendar year. Each annual report shall specify the annual OC emissions for this emissions unit and for emissions units P007 through P015, P018 through P020, and P024 through P036, combined.

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V. Testing Requirements

1. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.
2. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.
3. Emission Limitation: On the days that no photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit no more than 50 (fifty) pounds per hour of organic compounds.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.
4. Emission Limitation: 75 tons OC per year from emissions units P007 through P015, P018 through P020, and P024 through P036, combined.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.
5. Formulation data shall be used to determine the organic compound contents of the materials employed for each final product and each cleanup material.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0243000241 Emissions Unit ID: P013 Issuance type: Title V Draft Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
Double cone rotary dryer, 20 cubic feet, D-12000	None	None

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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

1. The permit to install for this emissions unit (P013) was evaluated based on the actual materials employed and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant potentially emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each of the potential pollutants discharges from P013:

Pollutant: acetone
TLV (ug/m3): 1188000
Maximum Hourly Emission Rate (lbs/hr): 4.6
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3)*: 337 (EF45) and 304 (EF76)
MAGLC (ug/m3): 118800

Pollutant: acetonitrile
TLV (ug/m3): 67000
Maximum Hourly Emission Rate (lbs/hr): 1.2
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 90 (EF45) and 81 (EF76)
MAGLC (ug/m3): 6700

Pollutant: cyclohexane
TLV (ug/m3): 1030000
Maximum Hourly Emission Rate (lbs/hr): 2.7
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 194 (EF45) and 175 (EF76)
MAGLC (ug/m3): 103000

Pollutant: dimethylformamide
TLV (ug/m3): 30000
Maximum Hourly Emission Rate (lbs/hr): 0.1
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 5 (EF45) and 4 (EF76)
MAGLC (ug/m3): 3000

Pollutant: ethyl acetate
TLV (ug/m3): 1440000
Maximum Hourly Emission Rate (lbs/hr): 2.5
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 181 (EF45) and 164 (EF76)
MAGLC (ug/m3): 144000

Pollutant: ethyl alcohol
TLV (ug/m3): 1880000
Maximum Hourly Emission Rate (lbs/hr): 0.7
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 50 (EF45) and 45 (EF76)
MAGLC (ug/m3): 188000

Pollutant: heptane
TLV (ug/m3): 1640000
Maximum Hourly Emission Rate (lbs/hr): 1.3
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 98 (EF45) and 89 (EF76)
MAGLC (ug/m3): 164000

Pollutant: isopropyl alcohol
TLV (ug/m3): 983000
Maximum Hourly Emission Rate (lbs/hr): 0.6
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 47 (EF45) and 42 (EF76)
MAGLC (ug/m3): 98300

Pollutant: methyl alcohol
TLV (ug/m3): 262000
Maximum Hourly Emission Rate (lbs/hr): 1.1
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 83 (EF45) and 75 (EF76)
MAGLC (ug/m3): 26200

Pollutant: methylamyl alcohol
TLV (ug/m3): 104000
Maximum Hourly Emission Rate (lbs/hr): 0.0
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3 (EF45) and 2 (EF76)
MAGLC (ug/m3): 10400

Pollutant: methylene chloride
TLV (ug/m3): 174000
Maximum Hourly Emission Rate (lbs/hr): 13.6
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 995 (EF45) and 898 (EF76)
MAGLC (ug/m3): 17400

Pollutant: methyl tert butyl ether
TLV (ug/m3): 144000
Maximum Hourly Emission Rate (lbs/hr): 7.8
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 573 (EF45) and 517 (EF76)
MAGLC (ug/m3): 14400

Pollutant: pyridine
TLV (ug/m3): 16000

Maximum Hourly Emission Rate (lbs/hr): 0.4
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 32 (EF45) and 29 (EF76)
 MAGLC (ug/m3): 1600

Pollutant: tetrahydrofuran
 TLV (ug/m3): 590000
 Maximum Hourly Emission Rate (lbs/hr): 3.9
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 287 (EF45) and 259 (EF76)
 MAGLC (ug/m3): 59000

Pollutant: toluene
 TLV (ug/m3): 188000
 Maximum Hourly Emission Rate (lbs/hr): 0.7
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 55 (EF45) and 50 (EF76)
 MAGLC (ug/m3): 18800
 * Emissions unit will discharge through either egress point EF45 or EF76, but not both simultaneously.

Physical changes to or changes in the method of operation of the emissions unit after its installation 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 be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

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

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

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

2. The permittee shall sum the predicted 1-hour maximum ground-level concentrations for each pollutant from emissions units P007 through P015, P018 through P020, and P024 through P036, to demonstrate compliance with the "Air Toxic Policy". This sum shall take into account the actual equipment's operating schedule and equipment utilization. Comparison of the sum to the MAGLC shall be made to demonstrate compliance with the "Air Toxic Policy".

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0243000241 Emissions Unit ID: P014 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
Vacuum shelf dryer system, 183.3 square feet, D-13000	OAC rule 3745-21-07(G)(2)	See A.I.2.a below.
	OAC rule 3745-31-05(A)(3) PTI 02-13904	See A.I.2.b and A.I.2.c below.
	OAC rule 3745-21-28	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2). None. See A.I.2.d below.

2. Additional Terms and Conditions

- a. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day nor more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01. Emissions of organic materials from cleanup with photochemically reactive materials shall be included in the calculation of actual emissions when determining compliance with the 8 pounds per hour and 40 pounds per day limits.
- b. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are not employed, applied, evaporated, or dried, the permittee shall emit no more than 50 (fifty) pounds per hour of organic compounds.
- c. The emissions of organic compounds from emissions units P007 through P015, P018 through P020, and P024 through P036, combined, shall be limited to 75 (seventy five) tons per year.
- d. This emissions unit is exempt from the requirements of OAC rule 3745-31-28 pursuant to the exemption in OAC rule 3745-31-28(C)(5) for any major MACT source that is a research and development activity.

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall keep the following daily records for all materials used in this emissions unit:
 - a. the identification of the chemical compound and its physical state; and
 - b. for any liquid organic materials, whether or not each material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall develop an emission factor for the total amount of organic compounds emitted for each final product generated in this emissions unit. The emission factors shall be in units of pounds of organic compounds emitted per pound of final product generated. The permittee shall indicate whether or not each emission factor is based upon the use of any photochemically reactive materials. The permittee's calculation of each emission factor shall be subject to the review and approval of the Ohio EPA Northeast District Office.
3. The permittee shall collect and record the following information for each final product generated in this emissions unit:

- a. the company identification for each final product generated;
 - b. whether or not any photochemically reactive materials were used to generate each final product;
 - c. the quantity of each final product generated, in pounds;
 - d. the emission factor for each final product generated, in pounds of organic compounds emitted per pound of final product generated;
 - e. the number of days the emissions unit was in operation to generate each final product; and
 - f. the average daily organic compound emission rate, in pounds per day $(c \times d)/e$.
4. The permittee shall collect and record the following information each day for all final products generated in this emissions unit:
- a. For each day during which any photochemically reactive material was used as a cleanup material and/or for one or more of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from $i = 1$ to $i = n$, of A.III.3.f).
 - b. For each day during which no photochemically reactive material was used as a cleanup material and/or for any of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from $i = 1$ to $i = n$, of A.III.3.f).
5. The permittee shall collect and record the following information for the cleanup materials employed each day in this emissions unit:
- a. the company identification for each cleanup material;
 - b. whether or not each cleanup material is a photochemically reactive material;
 - c. the quantity of each cleanup material employed that is a photochemically reactive material, in gallons;
 - d. the OC content of each cleanup material employed that is a photochemically reactive material, in pounds per gallon;
 - e. the quantity of each cleanup material employed that is not a photochemically reactive material, in gallons;
 - f. the OC content of each cleanup material employed that is not a photochemically reactive material, in pounds per gallon;
 - g. the daily emissions of the cleanup materials that are photochemically reactive materials, in pounds per day (the summation, from $i = 1$ to $i = n$ of $c \times d$);
 - h. the daily emissions of the cleanup materials that are not photochemically reactive materials, in pounds per day (the summation, from $i = 1$ to $i = n$ of $e \times f$); and
 - i. the total daily OC emissions from all cleanup materials, in pounds per day $(g + h)$.
6. The permittee shall collect and record the following information each day for this emissions unit:
- a. the number of hours of operation;
 - b. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per day $(A.III.5.g + A.III.4.a)$;
 - c. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the average hourly emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per hour $(A.III.6.b/A.III.6.a)$;
 - d. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are not photochemically reactive materials, in pounds per day $(A.III.5.h)$;
 - e. for each day during which no photochemically reactive material was used for any of the final products and/or any of the cleanup materials, the total daily emissions from all final products and all cleanup materials, in pounds per day $(A.III.5.h + A.III.4.b)$;
 - f. for each day during which no photochemically reactive material was used for any of the final products and/or any of the cleanup materials, the average hourly emissions from all final products and all cleanup materials, in pounds per hour $(A.III.6.e/A.III.6.a)$; and
 - g. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions for all final products and all cleanup materials, in pounds per day $(A.III.6.b + A.III.6.d)$.
7. The permittee shall record annually the OC emissions from this emissions unit and from emissions units P007 through P015, P018 through P020, and P024 through P036, combined. The annual emission (in tons) for this emissions unit shall be calculated by summing the values from A.III.6.e and A.III.6.g for the entire calendar year and then dividing by 2000.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 8 pounds per hour, and the actual average organic compound emission rate for each such day.
 - b. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - c. For the days during which no photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the emissions unit exceeded 50 pounds per hour, and the actual organic compound emission rate for each such day.
2. Each year, the permittee shall submit an annual report, by March 31, for the preceding calendar year. Each annual report shall specify the annual OC emissions for this emissions unit and for emissions units P007 through P015, P018 through P020, and P024 through P036, combined.

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V. **Testing Requirements**

1. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.
2. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.
3. Emission Limitation: On the days that no photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit no more than 50 (fifty) pounds per hour of organic compounds.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.
4. Emission Limitation: 75 tons OC per year from emissions units P007 through P015, P018 through P020, and P024 through P036, combined.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.
5. Formulation data shall be used to determine the organic compound contents of the materials employed for each final product and each cleanup material.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0243000241 Emissions Unit ID: P014 Issuance type: Title V Draft Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
Vacuum shelf dryer system, 183.3 square feet, D-13000	None	None

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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

1. The permit to install for this emissions unit (P014) was evaluated based on the actual materials employed and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant potentially emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each of the potential pollutants discharges from P014:

Pollutant: acetone
 TLV (ug/m3): 1188000
 Maximum Hourly Emission Rate (lbs/hr): 7.0
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3)*: 513 (EF45) and 463 (EF76)
 MAGLC (ug/m3): 118800

Pollutant: acetonitrile
 TLV (ug/m3): 67000
 Maximum Hourly Emission Rate (lbs/hr): 1.9
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 136 (EF45) and 123 (EF76)
 MAGLC (ug/m3): 6700

Pollutant: cyclohexane
 TLV (ug/m3): 1030000
 Maximum Hourly Emission Rate (lbs/hr): 4.0
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 295 (EF45) and 267 (EF76)
 MAGLC (ug/m3): 103000

Pollutant: dimethylformamide
 TLV (ug/m3): 30000
 Maximum Hourly Emission Rate (lbs/hr): 0.1
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 7 (EF45) and 7 (EF76)
 MAGLC (ug/m3): 3000

Pollutant: ethyl acetate
 TLV (ug/m3): 1440000
 Maximum Hourly Emission Rate (lbs/hr): 3.8
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 276 (EF45) and 249 (EF76)
 MAGLC (ug/m3): 144000

Pollutant: ethyl alcohol
 TLV (ug/m3): 1880000
 Maximum Hourly Emission Rate (lbs/hr): 1.0
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 76 (EF45) and 68 (EF76)
 MAGLC (ug/m3): 188000

Pollutant: heptane
 TLV (ug/m3): 1640000
 Maximum Hourly Emission Rate (lbs/hr): 2.0
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 149 (EF45) and 135 (EF76)
 MAGLC (ug/m3): 164000

Pollutant: isopropyl alcohol
 TLV (ug/m3): 983000
 Maximum Hourly Emission Rate (lbs/hr): 1.0
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 71 (EF45) and 64 (EF76)
 MAGLC (ug/m3): 98300

Pollutant: methyl alcohol
 TLV (ug/m3): 262000

Maximum Hourly Emission Rate (lbs/hr): 1.7

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 127 (EF45) and 115 (EF76)
MAGLC (ug/m3): 26200

Pollutant: methylamyl alcohol
TLV (ug/m3): 104000

Maximum Hourly Emission Rate (lbs/hr): 0.1
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4 (EF45) and 4 (EF76)
MAGLC (ug/m3): 10400

Pollutant: methylene chloride
TLV (ug/m3): 174000

Maximum Hourly Emission Rate (lbs/hr): 20.7
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1513 (EF45) and 1365 (EF76)
MAGLC (ug/m3): 17400

Pollutant: methyl tert butyl ether

TLV (ug/m3): 144000
Maximum Hourly Emission Rate (lbs/hr): 11.9
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 871 (EF45) and 786 (EF76)
MAGLC (ug/m3): 14400

Pollutant: pyridine
TLV (ug/m3): 16000

Maximum Hourly Emission Rate (lbs/hr): 0.7
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 49 (EF45) and 44 (EF76)
MAGLC (ug/m3): 1600

Pollutant: tetrahydrofuran

TLV (ug/m3): 590000
Maximum Hourly Emission Rate (lbs/hr): 6.0
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 436 (EF45) and 393 (EF76)
MAGLC (ug/m3): 59000

Pollutant: toluene

TLV (ug/m3): 188000
Maximum Hourly Emission Rate (lbs/hr): 1.1
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 83 (EF45) and 75 (EF76)
MAGLC (ug/m3): 18800

* Emissions unit will discharge through either egress point EF45 or EF76, but not both simultaneously.

Physical changes to or changes in the method of operation of the emissions unit after its installation 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 be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

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

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

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

2. The permittee shall sum the predicted 1-hour maximum ground-level concentrations for each pollutant from emissions units P007 through P015, P018 through P020, and P024 through P036, to demonstrate compliance with the "Air Toxic Policy". This sum shall take into account the actual equipment's operating schedule and equipment utilization. Comparison of the sum to the MAGLC shall be made to demonstrate compliance with the "Air Toxic Policy".

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0243000241 Emissions Unit ID: P015 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
100 gallon GLS reaction system, R-100	OAC rule 3745-21-07(G)(2) OAC rule 3745-31-05(A)(3) PTI 02-13904	See A.I.2.a below. See A.I.2.b and A.I.2.c below.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).

2. Additional Terms and Conditions

- a. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day nor more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01. Emissions of organic materials from cleanup with photochemically reactive materials shall be included in the calculation of actual emissions when determining compliance with the 8 pounds per hour and 40 pounds per day limits.
- b. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are not employed, applied, evaporated, or dried, the permittee shall emit no more than 50 (fifty) pounds per hour of organic compounds.
- c. The emissions of organic compounds from emissions units P007 through P015, P018 through P020, and P024 through P036, combined, shall be limited to 75 (seventy five) tons per year.

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall keep the following daily records for all materials used in this emissions unit:
 - a. the identification of the chemical compound and its physical state; and
 - b. for any liquid organic materials, whether or not each material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall develop an emission factor for the total amount of organic compounds emitted for each final product generated in this emissions unit. The emission factors shall be in units of pounds of organic compounds emitted per pound of final product generated. The permittee shall indicate whether or not each emission factor is based upon the use of any photochemically reactive materials. The permittee's calculation of each emission factor shall be subject to the review and approval of the Ohio EPA Northeast District Office.
3. The permittee shall collect and record the following information for each final product generated in this emissions unit:
 - a. the company identification for each final product generated;
 - b. whether or not any photochemically reactive materials were used to generate each final product;
 - c. the quantity of each final product generated, in pounds;
 - d. the emission factor for each final product generated, in pounds of organic compounds emitted per pound of final product generated;
 - e. the number of days the emissions unit was in operation to generate each final product; and
 - f. the average daily organic compound emission rate, in pounds per day (c x d)/e.
4. The permittee shall collect and record the following information each day for all final products generated in this emissions unit:
 - a. For each day during which any photochemically reactive material was used as a cleanup material and/or for one or more of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from $i = 1$ to $i = n$, of A.III.3.f).
 - b. For each day during which no photochemically reactive material was used as a cleanup material and/or for any of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from $i = 1$ to $i = n$, of A.III.3.f).
5. The permittee shall collect and record the following information for the cleanup materials employed each day in this emissions unit:
 - a. the company identification for each cleanup material;
 - b. whether or not each cleanup material is a photochemically reactive material;
 - c. the quantity of each cleanup material employed that is a photochemically reactive material, in gallons;
 - d. the OC content of each cleanup material employed that is a photochemically reactive material, in pounds per gallon;
 - e. the quantity of each cleanup material employed that is not a photochemically reactive material, in gallons;
 - f. the OC content of each cleanup material employed that is not a photochemically reactive material, in pounds per gallon;
 - g. the daily emissions of the cleanup materials that are photochemically reactive materials, in pounds per day (the summation, from $i = 1$ to $i = n$ of c x d);
 - h. the daily emissions of the cleanup materials that are not photochemically reactive materials, in pounds per day (the summation, from $i = 1$ to $i = n$ of e x f); and
 - i. the total daily OC emissions from all cleanup materials, in pounds per day (g + h).
6. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the number of hours of operation;
 - b. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per day (A.III.5.g + A.III.4.a);
 - c. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the average hourly emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per hour (A.III.6.b/A.III.6.a);
 - d. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are not photochemically reactive materials, in pounds per day (A.III.5.h);
 - e. for each day during which no photochemically reactive material was used for any of the final products and/or any of the cleanup materials, the total daily emissions from all final products and all cleanup materials, in pounds per day (A.III.5.h + A.III.4.b);

- f. for each day during which no photochemically reactive material was used for any of the final products and/or any of the cleanup materials, the average hourly emissions from all final products and all cleanup materials, in pounds per hour (A.III.6.e/ A.III.6.a); and
 - g. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions for all final products and all cleanup materials, in pounds per day (A.III.6.b + A.III.6.d).
7. The permittee shall record annually the OC emissions from this emissions unit and from emissions units P007 through P015, P018 through P020, and P024 through P036, combined. The annual emission (in tons) for this emissions unit shall be calculated by summing the values from A.III.6.e and A.III.6.g for the entire calendar year and then dividing by 2000.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 8 pounds per hour, and the actual average organic compound emission rate for each such day.
 - b. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - c. For the days during which no photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the emissions unit exceeded 50 pounds per hour, and the actual organic compound emission rate for each such day.
2. Each year, the permittee shall submit an annual report, by March 31, for the preceding calendar year. Each annual report shall specify the annual OC emissions for this emissions unit and for emissions units P007 through P015, P018 through P020, and P024 through P036, combined.

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V. Testing Requirements

1. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.
2. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.
3. Emission Limitation: On the days that no photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit no more than 50 (fifty) pounds per hour of organic compounds.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.
4. Emission Limitation: 75 tons OC per year from emissions units P007 through P015, P018 through P020, and P024 through P036, combined.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.
5. Formulation data shall be used to determine the organic compound contents of the materials employed for each final product and each cleanup material.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0243000241 Emissions Unit ID: P015 Issuance type: Title V Draft Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
100 gallon GLS reaction system, R-100	None	None
2. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. None

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0243000241 Emissions Unit ID: P016 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
100 gallon SS reaction system, R-200	OAC rule 3745-21-07(G)(2)	See A.I.2.a below.

2. Additional Terms and Conditions

- a. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day nor more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01. Emissions of organic materials from cleanup with photochemically reactive materials shall be included in the calculation of actual emissions when determining compliance with the 8 pounds per hour and 40 pounds per day limits.

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall keep the following daily records for all materials used in this emissions unit:
 - a. the identification of the chemical compound and its physical state; and
 - b. for any liquid organic materials, whether or not each material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall develop an emission factor for the total amount of organic compounds emitted for each final product generated in this emissions unit. The emission factors shall be in units of pounds of organic compounds emitted per pound of final product generated. The permittee shall indicate whether or not each emission factor is based upon the use of any photochemically reactive materials. The permittee's calculation of each emission factor shall be subject to the review and approval of the Ohio EPA Northeast District Office.
3. The permittee shall collect and record the following information for each final product generated in this emissions unit:
 - a. the company identification for each final product generated;
 - b. whether or not any photochemically reactive materials were used to generate each final product;
 - c. the quantity of each final product generated, in pounds;
 - d. the emission factor for each final product generated, in pounds of organic compounds emitted per pound of final product generated;
 - e. the number of days the emissions unit was in operation to generate each final product; and
 - f. the average daily organic compound emission rate, in pounds per day (c x d)/e.
4. The permittee shall collect and record the following information each day for all final products generated in this emissions unit:

For each day during which any photochemically reactive material was used as a cleanup material and/or for one or more of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from i = 1 to i = n, of A.III.3.f).
5. The permittee shall collect and record the following information for the cleanup materials employed each day in this emissions unit:
 - a. the company identification for each cleanup material;
 - b. whether or not each cleanup material is a photochemically reactive material;
 - c. the quantity of each cleanup material employed that is a photochemically reactive material, in gallons;
 - d. the OC content of each cleanup material employed that is a photochemically reactive material, in pounds per gallon;

- e. the quantity of each cleanup material employed that is not a photochemically reactive material, in gallons;
 - f. the OC content of each cleanup material employed that is not a photochemically reactive material, in pounds per gallon;
 - g. the daily emissions of the cleanup materials that are photochemically reactive materials, in pounds per day (the summation, from $i = 1$ to $i = n$ of $c \times d$);
 - h. the daily emissions of the cleanup materials that are not photochemically reactive materials, in pounds per day (the summation, from $i = 1$ to $i = n$ of $e \times f$); and
 - i. the total daily OC emissions from all cleanup materials, in pounds per day ($g + h$).
6. The permittee shall collect and record the following information each day for this emissions unit:
- a. the number of hours of operation;
 - b. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per day (A.III.5.g + A.III.4.a);
 - c. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the average hourly emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per hour (A.III.6.b/A.III.6.a);
 - d. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are not photochemically reactive materials, in pounds per day (A.III.5.h); and
 - e. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions for all final products and all cleanup materials, in pounds per day (A.III.6.b + A.III.6.d).

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
- a. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 8 pounds per hour, and the actual average organic compound emission rate for each such day.
 - b. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

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V. Testing Requirements

1. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day of organic compounds, as defined in OAC rule 3745-21-01.
- Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.
2. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01.
- Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.
3. Formulation data shall be used to determine the organic compound contents of the materials employed for each final product and each cleanup material.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0243000241 Emissions Unit ID: P016 Issuance type: Title V Draft Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
2.	Additional Terms and Conditions		
1.	None	None	None
	100 gallon SS reaction system, R-200	None	None

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0243000241 Emissions Unit ID: P017 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
20 gallon GLS reaction system, R-300	OAC rule 3745-21-07(G)(2)	See A.I.2.a below.

2. Additional Terms and Conditions

- a. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day nor more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01. Emissions of organic materials from cleanup with photochemically reactive materials shall be included in the calculation of actual emissions when determining compliance with the 8 pounds per hour and 40 pounds per day limits.

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall keep the following daily records for all materials used in this emissions unit:
 - a. the identification of the chemical compound and its physical state; and
 - b. for any liquid organic materials, whether or not each material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall develop an emission factor for the total amount of organic compounds emitted for each final product generated in this emissions unit. The emission factors shall be in units of pounds of organic compounds emitted per pound of final product generated. The permittee shall indicate whether or not each emission factor is based upon the use of any photochemically reactive materials. The permittee's calculation of each emission factor shall be subject to the review and approval of the Ohio EPA Northeast District Office.
3. The permittee shall collect and record the following information for each final product generated in this emissions unit:
 - a. the company identification for each final product generated;
 - b. whether or not any photochemically reactive materials were used to generate each final product;
 - c. the quantity of each final product generated, in pounds;
 - d. the emission factor for each final product generated, in pounds of organic compounds emitted per pound of final product generated;
 - e. the number of days the emissions unit was in operation to generate each final product; and
 - f. the average daily organic compound emission rate, in pounds per day (c x d)/e.
4. The permittee shall collect and record the following information each day for all final products generated in this emissions unit:

For each day during which any photochemically reactive material was used as a cleanup material and/or for one or more of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from i = 1 to i = n, of A.III.3.f).
5. The permittee shall collect and record the following information for the cleanup materials employed each day in this emissions unit:
 - a. the company identification for each cleanup material;
 - b. whether or not each cleanup material is a photochemically reactive material;
 - c. the quantity of each cleanup material employed that is a photochemically reactive material, in gallons;
 - d. the OC content of each cleanup material employed that is a photochemically reactive material, in pounds per gallon;

- e. the quantity of each cleanup material employed that is not a photochemically reactive material, in gallons;
 - f. the OC content of each cleanup material employed that is not a photochemically reactive material, in pounds per gallon;
 - g. the daily emissions of the cleanup materials that are photochemically reactive materials, in pounds per day (the summation, from $i = 1$ to $i = n$ of $c \times d$);
 - h. the daily emissions of the cleanup materials that are not photochemically reactive materials, in pounds per day (the summation, from $i = 1$ to $i = n$ of $e \times f$); and
 - i. the total daily OC emissions from all cleanup materials, in pounds per day ($g + h$).
6. The permittee shall collect and record the following information each day for this emissions unit:
- a. the number of hours of operation;
 - b. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per day (A.III.5.g + A.III.4.a);
 - c. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the average hourly emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per hour (A.III.6.b/A.III.6.a);
 - d. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are not photochemically reactive materials, in pounds per day (A.III.5.h); and
 - e. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions for all final products and all cleanup materials, in pounds per day (A.III.6.b + A.III.6.d).

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
- a. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 8 pounds per hour, and the actual average organic compound emission rate for each such day.
 - b. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

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V. Testing Requirements

1. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day of organic compounds, as defined in OAC rule 3745-21-01.
- Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.
2. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01.
- Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.
3. Formulation data shall be used to determine the organic compound contents of the materials employed for each final product and each cleanup material.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0243000241 Emissions Unit ID: P017 Issuance type: Title V Draft Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
20 gallon GLS reaction system, R-300	None	None
2. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. None

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0243000241 Emissions Unit ID: P018 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
50 gallon Ni-clad reaction system, R-400	OAC rule 3745-21-07(G)(2) OAC rule 3745-31-05(A)(3) PTI 02-13904	See A.I.2.a below. See A.I.2.b and A.I.2.c below.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).

2. Additional Terms and Conditions

- a. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day nor more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01. Emissions of organic materials from cleanup with photochemically reactive materials shall be included in the calculation of actual emissions when determining compliance with the 8 pounds per hour and 40 pounds per day limits.
- b. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are not employed, applied, evaporated, or dried, the permittee shall emit no more than 50 (fifty) pounds per hour of organic compounds.
- c. The emissions of organic compounds from emissions units P007 through P015, P018 through P020, and P024 through P036, combined, shall be limited to 75 (seventy five) tons per year.

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall keep the following daily records for all materials used in this emissions unit:
 - a. the identification of the chemical compound and its physical state; and
 - b. for any liquid organic materials, whether or not each material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall develop an emission factor for the total amount of organic compounds emitted for each final product generated in this emissions unit. The emission factors shall be in units of pounds of organic compounds emitted per pound of final product generated. The permittee shall indicate whether or not each emission factor is based upon the use of any photochemically reactive materials. The permittee's calculation of each emission factor shall be subject to the review and approval of the Ohio EPA Northeast District Office.
3. The permittee shall collect and record the following information for each final product generated in this emissions unit:
 - a. the company identification for each final product generated;
 - b. whether or not any photochemically reactive materials were used to generate each final product;
 - c. the quantity of each final product generated, in pounds;
 - d. the emission factor for each final product generated, in pounds of organic compounds emitted per pound of final product generated;
 - e. the number of days the emissions unit was in operation to generate each final product; and
 - f. the average daily organic compound emission rate, in pounds per day (c x d)/e.
4. The permittee shall collect and record the following information each day for all final products generated in this emissions unit:
 - a. For each day during which any photochemically reactive material was used as a cleanup material and/or for one or more of the final products, the total average daily emissions from all final products produced

- that day, in pounds per day (the summation, from $i = 1$ to $i = n$, of A.III.3.f).
- b. For each day during which no photochemically reactive material was used as a cleanup material and/or for any of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from $i = 1$ to $i = n$, of A.III.3.f).
5. The permittee shall collect and record the following information for the cleanup materials employed each day in this emissions unit:
 - a. the company identification for each cleanup material;
 - b. whether or not each cleanup material is a photochemically reactive material;
 - c. the quantity of each cleanup material employed that is a photochemically reactive material, in gallons;
 - d. the OC content of each cleanup material employed that is a photochemically reactive material, in pounds per gallon;
 - e. the quantity of each cleanup material employed that is not a photochemically reactive material, in gallons;
 - f. the OC content of each cleanup material employed that is not a photochemically reactive material, in pounds per gallon;
 - g. the daily emissions of the cleanup materials that are photochemically reactive materials, in pounds per day (the summation, from $i = 1$ to $i = n$ of $c \times d$);
 - h. the daily emissions of the cleanup materials that are not photochemically reactive materials, in pounds per day (the summation, from $i = 1$ to $i = n$ of $e \times f$); and
 - i. the total daily OC emissions from all cleanup materials, in pounds per day ($g + h$).
 6. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the number of hours of operation;
 - b. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per day (A.III.5.g + A.III.4.a);
 - c. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the average hourly emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per hour (A.III.6.b/A.III.6.a);
 - d. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are not photochemically reactive materials, in pounds per day (A.III.5.h);
 - e. for each day during which no photochemically reactive material was used for any of the final products and/or any of the cleanup materials, the total daily emissions from all final products and all cleanup materials, in pounds per day (A.III.5.h + A.III.4.b);
 - f. for each day during which no photochemically reactive material was used for any of the final products and/or any of the cleanup materials, the average hourly emissions from all final products and all cleanup materials, in pounds per hour (A.III.6.e/ A.III.6.a); and
 - g. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions for all final products and all cleanup materials, in pounds per day (A.III.6.b + A.III.6.d).
 7. The permittee shall record annually the OC emissions from this emissions unit and from emissions units P007 through P015, P018 through P020, and P024 through P036, combined. The annual emission (in tons) for this emissions unit shall be calculated by summing the values from A.III.6.e and A.III.6.g for the entire calendar year and then dividing by 2000.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 8 pounds per hour, and the actual average organic compound emission rate for each such day.
 - b. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - c. For the days during which no photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the emissions unit exceeded 50 pounds per hour, and the actual organic compound emission rate for each such day.
2. Each year, the permittee shall submit an annual report, by March 31, for the preceding calendar year. Each annual report shall specify the annual OC emissions for this emissions unit and for emissions units P007

through P015, P018 through P020, and P024 through P036, combined.

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V. **Testing Requirements**

1. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.
2. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.
3. Emission Limitation: On the days that no photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit no more than 50 (fifty) pounds per hour of organic compounds.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.
4. Emission Limitation: 75 tons OC per year from emissions units P007 through P015, P018 through P020, and P024 through P036, combined.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.
5. Formulation data shall be used to determine the organic compound contents of the materials employed for each final product and each cleanup material.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0243000241 Emissions Unit ID: P018 Issuance type: Title V Draft Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
50 gallon Ni-clad reaction system, R-400	None	None

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

- 1. None

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

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0243000241 Emissions Unit ID: P019 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
50 gallon GLS reaction system, R-500	OAC rule 3745-21-07(G)(2) OAC rule 3745-31-05(A)(3) PTI 02-13904	See A.I.2.a below. See A.I.2.b and A.I.2.c below.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).

2. **Additional Terms and Conditions**

- a. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day nor more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01. Emissions of organic materials from cleanup with photochemically reactive materials shall be included in the calculation of actual emissions when determining compliance with the 8 pounds per hour and 40 pounds per day limits.
- b. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are not employed, applied, evaporated, or dried, the permittee shall emit no more than 50 (fifty) pounds per hour of organic compounds.

- c. The emissions of organic compounds from emissions units P007 through P015, P018 through P020, and P024 through P036, combined, shall be limited to 75 (seventy five) tons per year.

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall keep the following daily records for all materials used in this emissions unit:
 - a. the identification of the chemical compound and its physical state; and
 - b. for any liquid organic materials, whether or not each material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall develop an emission factor for the total amount of organic compounds emitted for each final product generated in this emissions unit. The emission factors shall be in units of pounds of organic compounds emitted per pound of final product generated. The permittee shall indicate whether or not each emission factor is based upon the use of any photochemically reactive materials. The permittee's calculation of each emission factor shall be subject to the review and approval of the Ohio EPA Northeast District Office.
3. The permittee shall collect and record the following information for each final product generated in this emissions unit:
 - a. the company identification for each final product generated;
 - b. whether or not any photochemically reactive materials were used to generate each final product;
 - c. the quantity of each final product generated, in pounds;
 - d. the emission factor for each final product generated, in pounds of organic compounds emitted per pound of final product generated;
 - e. the number of days the emissions unit was in operation to generate each final product; and
 - f. the average daily organic compound emission rate, in pounds per day (c x d)/e.
4. The permittee shall collect and record the following information each day for all final products generated in this emissions unit:
 - a. For each day during which any photochemically reactive material was used as a cleanup material and/or for one or more of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from $i = 1$ to $i = n$, of A.III.3.f).
 - b. For each day during which no photochemically reactive material was used as a cleanup material and/or for any of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from $i = 1$ to $i = n$, of A.III.3.f).
5. The permittee shall collect and record the following information for the cleanup materials employed each day in this emissions unit:
 - a. the company identification for each cleanup material;
 - b. whether or not each cleanup material is a photochemically reactive material;
 - c. the quantity of each cleanup material employed that is a photochemically reactive material, in gallons;
 - d. the OC content of each cleanup material employed that is a photochemically reactive material, in pounds per gallon;
 - e. the quantity of each cleanup material employed that is not a photochemically reactive material, in gallons;
 - f. the OC content of each cleanup material employed that is not a photochemically reactive material, in pounds per gallon;
 - g. the daily emissions of the cleanup materials that are photochemically reactive materials, in pounds per day (the summation, from $i = 1$ to $i = n$ of c x d);
 - h. the daily emissions of the cleanup materials that are not photochemically reactive materials, in pounds per day (the summation, from $i = 1$ to $i = n$ of e x f); and
 - i. the total daily OC emissions from all cleanup materials, in pounds per day (g + h).
6. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the number of hours of operation;

- b. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per day (A.III.5.g + A.III.4.a);
 - c. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the average hourly emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per hour (A.III.6.b/A.III.6.a);
 - d. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are not photochemically reactive materials, in pounds per day (A.III.5.h);
 - e. for each day during which no photochemically reactive material was used for any of the final products and/or any of the cleanup materials, the total daily emissions from all final products and all cleanup materials, in pounds per day (A.III.5.h + A.III.4.b);
 - f. for each day during which no photochemically reactive material was used for any of the final products and/or any of the cleanup materials, the average hourly emissions from all final products and all cleanup materials, in pounds per hour (A.III.6.e/ A.III.6.a); and
 - g. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions for all final products and all cleanup materials, in pounds per day (A.III.6.b + A.III.6.d).
7. The permittee shall record annually the OC emissions from this emissions unit and from emissions units P007 through P015, P018 through P020, and P024 through P036, combined. The annual emission (in tons) for this emissions unit shall be calculated by summing the values from A.III.6.e and A.III.6.g for the entire calendar year and then dividing by 2000.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 8 pounds per hour, and the actual average organic compound emission rate for each such day.
 - b. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - c. For the days during which no photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the emissions unit exceeded 50 pounds per hour, and the actual organic compound emission rate for each such day.
2. Each year, the permittee shall submit an annual report, by March 31, for the preceding calendar year. Each annual report shall specify the annual OC emissions for this emissions unit and for emissions units P007 through P015, P018 through P020, and P024 through P036, combined.

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V. Testing Requirements

1. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.
2. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.
3. Emission Limitation: On the days that no photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit no more than 50 (fifty) pounds per hour of organic compounds.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.
4. Emission Limitation: 75 tons OC per year from emissions units P007 through P015, P018 through P020, and P024 through P036, combined.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in

Section A.III of these terms and conditions.

5. Formulation data shall be used to determine the organic compound contents of the materials employed for each final product and each cleanup material.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0243000241 Emissions Unit ID: P019 Issuance type: Title V Draft Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
50 gallon GLS reaction system, R-500	None	None
2. Additional Terms and Conditions		
1. None		

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II. **Operational Restrictions**

1. None

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

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0243000241 Emissions Unit ID: P020 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
200 gallon GLS reaction system, R-600	OAC rule 3745-21-07(G)(2) OAC rule 3745-31-05(A)(3) PTI 02-13904	See A.I.2.a below. See A.I.2.b and A.I.2.c below.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).

2. Additional Terms and Conditions

- a. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day nor more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01. Emissions of organic materials from cleanup with photochemically reactive materials shall be included in the calculation of actual emissions when determining compliance with the 8 pounds per hour and 40 pounds per day limits.
- b. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are not employed, applied, evaporated, or dried, the permittee shall emit no more than 50 (fifty) pounds per hour of organic compounds.
- c. The emissions of organic compounds from emissions units P007 through P015, P018 through P020, and P024 through P036, combined, shall be limited to 75 (seventy five) tons per year.

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall keep the following daily records for all materials used in this emissions unit:
 - a. the identification of the chemical compound and its physical state; and
 - b. for any liquid organic materials, whether or not each material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall develop an emission factor for the total amount of organic compounds emitted for each final product generated in this emissions unit. The emission factors shall be in units of pounds of organic compounds emitted per pound of final product generated. The permittee shall indicate whether or not each emission factor is based upon the use of any photochemically reactive materials. The permittee's calculation of each emission factor shall be subject to the review and approval of the Ohio EPA Northeast District Office.
3. The permittee shall collect and record the following information for each final product generated in this emissions unit:
 - a. the company identification for each final product generated;

- b. whether or not any photochemically reactive materials were used to generate each final product;
 - c. the quantity of each final product generated, in pounds;
 - d. the emission factor for each final product generated, in pounds of organic compounds emitted per pound of final product generated;
 - e. the number of days the emissions unit was in operation to generate each final product; and
 - f. the average daily organic compound emission rate, in pounds per day (c x d)/e.
4. The permittee shall collect and record the following information each day for all final products generated in this emissions unit:
- a. For each day during which any photochemically reactive material was used as a cleanup material and/or for one or more of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from $i = 1$ to $i = n$, of A.III.3.f).
 - b. For each day during which no photochemically reactive material was used as a cleanup material and/or for any of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from $i = 1$ to $i = n$, of A.III.3.f).
5. The permittee shall collect and record the following information for the cleanup materials employed each day in this emissions unit:
- a. the company identification for each cleanup material;
 - b. whether or not each cleanup material is a photochemically reactive material;
 - c. the quantity of each cleanup material employed that is a photochemically reactive material, in gallons;
 - d. the OC content of each cleanup material employed that is a photochemically reactive material, in pounds per gallon;
 - e. the quantity of each cleanup material employed that is not a photochemically reactive material, in gallons;
 - f. the OC content of each cleanup material employed that is not a photochemically reactive material, in pounds per gallon;
 - g. the daily emissions of the cleanup materials that are photochemically reactive materials, in pounds per day (the summation, from $i = 1$ to $i = n$ of c x d);
 - h. the daily emissions of the cleanup materials that are not photochemically reactive materials, in pounds per day (the summation, from $i = 1$ to $i = n$ of e x f); and
 - i. the total daily OC emissions from all cleanup materials, in pounds per day (g + h).
6. The permittee shall collect and record the following information each day for this emissions unit:
- a. the number of hours of operation;
 - b. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per day (A.III.5.g + A.III.4.a);
 - c. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the average hourly emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per hour (A.III.6.b/A.III.6.a);
 - d. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are not photochemically reactive materials, in pounds per day (A.III.5.h);
 - e. for each day during which no photochemically reactive material was used for any of the final products and/or any of the cleanup materials, the total daily emissions from all final products and all cleanup materials, in pounds per day (A.III.5.h + A.III.4.b);
 - f. for each day during which no photochemically reactive material was used for any of the final products and/or any of the cleanup materials, the average hourly emissions from all final products and all cleanup materials, in pounds per hour (A.III.6.e/ A.III.6.a); and
 - g. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions for all final products and all cleanup materials, in pounds per day (A.III.6.b + A.III.6.d).
7. The permittee shall record annually the OC emissions from this emissions unit and from emissions units P007 through P015, P018 through P020, and P024 through P036, combined. The annual emission (in tons) for this emissions unit shall be calculated by summing the values from A.III.6.e and A.III.6.g for the entire calendar year and then dividing by 2000.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 8 pounds per hour, and the actual average organic compound emission rate for each such day.
 - b. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - c. For the days during which no photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the emissions unit exceeded 50 pounds per hour, and the actual organic compound emission rate for each such day.
2. Each year, the permittee shall submit an annual report, by March 31, for the preceding calendar year. Each annual report shall specify the annual OC emissions for this emissions unit and for emissions units P007 through P015, P018 through P020, and P024 through P036, combined.

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V. Testing Requirements

1. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.
2. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.
3. Emission Limitation: On the days that no photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit no more than 50 (fifty) pounds per hour of organic compounds.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.
4. Emission Limitation: 75 tons OC per year from emissions units P007 through P015, P018 through P020, and P024 through P036, combined.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.
5. Formulation data shall be used to determine the organic compound contents of the materials employed for each final product and each cleanup material.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0243000241 Emissions Unit ID: P020 Issuance type: Title V Draft Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
200 gallon GLS reaction system, R-600	None	None

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0243000241 Emissions Unit ID: P021 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
100 gallon nickle reaction system, R-700	OAC rule 3745-21-07(G)(2)	See A.I.2.a below.

2. **Additional Terms and Conditions**

- a. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day nor more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01. Emissions of organic materials from cleanup with photochemically reactive materials shall be included in the calculation of actual emissions when determining compliance with the 8 pounds per hour and 40 pounds per day limits.

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall keep the following daily records for all materials used in this emissions unit:
 - a. the identification of the chemical compound and its physical state; and
 - b. for any liquid organic materials, whether or not each material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall develop an emission factor for the total amount of organic compounds emitted for each final product generated in this emissions unit. The emission factors shall be in units of pounds of organic compounds emitted per pound of final product generated. The permittee shall indicate whether or not each emission factor is based upon the use of any photochemically reactive materials. The permittee's calculation of each emission factor shall be subject to the review and approval of the Ohio EPA Northeast District Office.
3. The permittee shall collect and record the following information for each final product generated in this emissions unit:
 - a. the company identification for each final product generated;
 - b. whether or not any photochemically reactive materials were used to generate each final product;
 - c. the quantity of each final product generated, in pounds;
 - d. the emission factor for each final product generated, in pounds of organic compounds emitted per pound of final product generated;
 - e. the number of days the emissions unit was in operation to generate each final product; and
 - f. the average daily organic compound emission rate, in pounds per day (c x d)/e.
4. The permittee shall collect and record the following information each day for all final products generated in this emissions unit:

For each day during which any photochemically reactive material was used as a cleanup material and/or for one or more of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from i = 1 to i = n, of A.III.3.f).
5. The permittee shall collect and record the following information for the cleanup materials employed each day in this emissions unit:
 - a. the company identification for each cleanup material;
 - b. whether or not each cleanup material is a photochemically reactive material;
 - c. the quantity of each cleanup material employed that is a photochemically reactive material, in gallons;
 - d. the OC content of each cleanup material employed that is a photochemically reactive material, in pounds per gallon;
 - e. the quantity of each cleanup material employed that is not a photochemically reactive material, in gallons;
 - f. the OC content of each cleanup material employed that is not a photochemically reactive material, in pounds per gallon;
 - g. the daily emissions of the cleanup materials that are photochemically reactive materials, in pounds per day (the summation, from i = 1 to i = n of c x d);
 - h. the daily emissions of the cleanup materials that are not photochemically reactive materials, in pounds per day (the summation, from i = 1 to i = n of e x f); and
 - i. the total daily OC emissions from all cleanup materials, in pounds per day (g + h).
6. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the number of hours of operation;

- b. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per day (A.III.5.g + A.III.4.a);
- c. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the average hourly emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per hour (A.III.6.b/A.III.6.a);
- d. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are not photochemically reactive materials, in pounds per day (A.III.5.h); and
- e. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions for all final products and all cleanup materials, in pounds per day (A.III.6.b + A.III.6.d).

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 8 pounds per hour, and the actual average organic compound emission rate for each such day.
 - b. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

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V. Testing Requirements

1. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.
2. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.
3. Formulation data shall be used to determine the organic compound contents of the materials employed for each final product and each cleanup material.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0243000241 Emissions Unit ID: P021 Issuance type: Title V Draft Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
2.	Additional Terms and Conditions		
1.	None	None	None

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II. **Operational Restrictions**

1. None

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

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0243000241 Emissions Unit ID: P022 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
2.	Additional Terms and Conditions		
1.	500 gallon GLS reaction system, R-800	OAC rule 3745-21-07(G)(2)	See A.I.2.a below.

- a. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day nor more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01. Emissions of organic materials from cleanup with photochemically reactive materials shall be included in the calculation of actual emissions when determining compliance with the 8 pounds per hour and 40 pounds per day limits.

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall keep the following daily records for all materials used in this emissions unit:
 - a. the identification of the chemical compound and its physical state; and
 - b. for any liquid organic materials, whether or not each material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall develop an emission factor for the total amount of organic compounds emitted for each final product generated in this emissions unit. The emission factors shall be in units of pounds of organic compounds emitted per pound of final product generated. The permittee shall indicate whether or not each emission factor is based upon the use of any photochemically reactive materials. The permittee's calculation of each emission factor shall be subject to the review and approval of the Ohio EPA Northeast District Office.
3. The permittee shall collect and record the following information for each final product generated in this emissions unit:
 - a. the company identification for each final product generated;
 - b. whether or not any photochemically reactive materials were used to generate each final product;
 - c. the quantity of each final product generated, in pounds;
 - d. the emission factor for each final product generated, in pounds of organic compounds emitted per pound of final product generated;
 - e. the number of days the emissions unit was in operation to generate each final product; and
 - f. the average daily organic compound emission rate, in pounds per day (c x d)/e.
4. The permittee shall collect and record the following information each day for all final products generated in this emissions unit:

For each day during which any photochemically reactive material was used as a cleanup material and/or for one or more of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from i = 1 to i = n, of A.III.3.f).
5. The permittee shall collect and record the following information for the cleanup materials employed each day in this emissions unit:
 - a. the company identification for each cleanup material;
 - b. whether or not each cleanup material is a photochemically reactive material;
 - c. the quantity of each cleanup material employed that is a photochemically reactive material, in gallons;
 - d. the OC content of each cleanup material employed that is a photochemically reactive material, in pounds per gallon;
 - e. the quantity of each cleanup material employed that is not a photochemically reactive material, in gallons;
 - f. the OC content of each cleanup material employed that is not a photochemically reactive material, in pounds per gallon;
 - g. the daily emissions of the cleanup materials that are photochemically reactive materials, in pounds per day (the summation, from i = 1 to i = n of c x d);
 - h. the daily emissions of the cleanup materials that are not photochemically reactive materials, in pounds per day (the summation, from i = 1 to i = n of e x f); and
 - i. the total daily OC emissions from all cleanup materials, in pounds per day (g + h).
6. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the number of hours of operation;

- b. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per day (A.III.5.g + A.III.4.a);
- c. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the average hourly emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per hour (A.III.6.b/A.III.6.a);
- d. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are not photochemically reactive materials, in pounds per day (A.III.5.h); and
- e. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions for all final products and all cleanup materials, in pounds per day (A.III.6.b + A.III.6.d).

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IV. Reporting Requirements

- 1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 8 pounds per hour, and the actual average organic compound emission rate for each such day.
 - b. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

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V. Testing Requirements

- 1. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.
- 2. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.
- 3. Formulation data shall be used to determine the organic compound contents of the materials employed for each final product and each cleanup material.

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0243000241 Emissions Unit ID: P022 Issuance type: Title V Draft Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
500 gallon GLS reaction system, R-800	None	None
2. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. None

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0243000241 Emissions Unit ID: P023 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
100 gallon SS reaction system, R-900	OAC rule 3745-21-07(G)(2)	See A.I.2.a below.
2. Additional Terms and Conditions		

- a. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day nor more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01. Emissions of organic materials from cleanup with photochemically reactive materials shall be included in the calculation of actual emissions when determining compliance with the 8 pounds per hour and 40 pounds per day limits.

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall keep the following daily records for all materials used in this emissions unit:
 - a. the identification of the chemical compound and its physical state; and
 - b. for any liquid organic materials, whether or not each material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall develop an emission factor for the total amount of organic compounds emitted for each final product generated in this emissions unit. The emission factors shall be in units of pounds of organic compounds emitted per pound of final product generated. The permittee shall indicate whether or not each emission factor is based upon the use of any photochemically reactive materials. The permittee's calculation of each emission factor shall be subject to the review and approval of the Ohio EPA Northeast District Office.
3. The permittee shall collect and record the following information for each final product generated in this emissions unit:
 - a. the company identification for each final product generated;
 - b. whether or not any photochemically reactive materials were used to generate each final product;
 - c. the quantity of each final product generated, in pounds;
 - d. the emission factor for each final product generated, in pounds of organic compounds emitted per pound of final product generated;
 - e. the number of days the emissions unit was in operation to generate each final product; and
 - f. the average daily organic compound emission rate, in pounds per day (c x d)/e.
4. The permittee shall collect and record the following information each day for all final products generated in this emissions unit:

For each day during which any photochemically reactive material was used as a cleanup material and/or for one or more of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from i = 1 to i = n, of A.III.3.f).
5. The permittee shall collect and record the following information for the cleanup materials employed each day in this emissions unit:
 - a. the company identification for each cleanup material;
 - b. whether or not each cleanup material is a photochemically reactive material;
 - c. the quantity of each cleanup material employed that is a photochemically reactive material, in gallons;
 - d. the OC content of each cleanup material employed that is a photochemically reactive material, in pounds per gallon;
 - e. the quantity of each cleanup material employed that is not a photochemically reactive material, in gallons;
 - f. the OC content of each cleanup material employed that is not a photochemically reactive material, in pounds per gallon;
 - g. the daily emissions of the cleanup materials that are photochemically reactive materials, in pounds per day (the summation, from i = 1 to i = n of c x d);
 - h. the daily emissions of the cleanup materials that are not photochemically reactive materials, in pounds per day (the summation, from i = 1 to i = n of e x f); and
 - i. the total daily OC emissions from all cleanup materials, in pounds per day (g + h).
6. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the number of hours of operation;

- b. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per day (A.III.5.g + A.III.4.a);
- c. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the average hourly emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per hour (A.III.6.b/A.III.6.a);
- d. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are not photochemically reactive materials, in pounds per day (A.III.5.h); and
- e. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions for all final products and all cleanup materials, in pounds per day (A.III.6.b + A.III.6.d).

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IV. Reporting Requirements

- 1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 8 pounds per hour, and the actual average organic compound emission rate for each such day.
 - b. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

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V. Testing Requirements

- 1. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.
- 2. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.
- 3. Formulation data shall be used to determine the organic compound contents of the materials employed for each final product and each cleanup material.

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0243000241 Emissions Unit ID: P023 Issuance type: Title V Draft Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
100 gallon SS reaction system, R-900	None	None

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0243000241 Emissions Unit ID: P024 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
500 gallon GLS reaction system, R-1000	OAC rule 3745-21-07(G)(2) OAC rule 3745-31-05(A)(3) PTI 02-13904	See A.I.2.a below. See A.I.2.b and A.I.2.c below.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).

2. Additional Terms and Conditions

- a. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day nor more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01. Emissions of organic materials from cleanup with photochemically reactive materials shall be included in the calculation of actual emissions when determining compliance with the 8 pounds per hour and 40 pounds per day limits.
- b. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are not employed, applied, evaporated, or dried, the permittee shall emit no more than 50 (fifty) pounds per hour of organic compounds.
- c. The emissions of organic compounds from emissions units P007 through P015, P018 through P020, and P024 through P036, combined, shall be limited to 75 (seventy five) tons per year.

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall keep the following daily records for all materials used in this emissions unit:
 - a. the identification of the chemical compound and its physical state; and
 - b. for any liquid organic materials, whether or not each material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall develop an emission factor for the total amount of organic compounds emitted for each final product generated in this emissions unit. The emission factors shall be in units of pounds of organic compounds emitted per pound of final product generated. The permittee shall indicate whether or not each emission factor is based upon the use of any photochemically reactive materials. The permittee's calculation of each emission factor shall be subject to the review and approval of the Ohio EPA Northeast District Office.
3. The permittee shall collect and record the following information for each final product generated in this emissions unit:
 - a. the company identification for each final product generated;
 - b. whether or not any photochemically reactive materials were used to generate each final product;
 - c. the quantity of each final product generated, in pounds;
 - d. the emission factor for each final product generated, in pounds of organic compounds emitted per pound of final product generated;
 - e. the number of days the emissions unit was in operation to generate each final product; and
 - f. the average daily organic compound emission rate, in pounds per day (c x d)/e.
4. The permittee shall collect and record the following information each day for all final products generated in this emissions unit:
 - a. For each day during which any photochemically reactive material was used as a cleanup material and/or for one or more of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from $i = 1$ to $i = n$, of A.III.3.f).
 - b. For each day during which no photochemically reactive material was used as a cleanup material and/or for any of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from $i = 1$ to $i = n$, of A.III.3.f).
5. The permittee shall collect and record the following information for the cleanup materials employed each day in this emissions unit:
 - a. the company identification for each cleanup material;
 - b. whether or not each cleanup material is a photochemically reactive material;
 - c. the quantity of each cleanup material employed that is a photochemically reactive material, in gallons;
 - d. the OC content of each cleanup material employed that is a photochemically reactive material, in pounds per gallon;

- e. the quantity of each cleanup material employed that is not a photochemically reactive material, in gallons;
 - f. the OC content of each cleanup material employed that is not a photochemically reactive material, in pounds per gallon;
 - g. the daily emissions of the cleanup materials that are photochemically reactive materials, in pounds per day (the summation, from $i = 1$ to $i = n$ of $c \times d$);
 - h. the daily emissions of the cleanup materials that are not photochemically reactive materials, in pounds per day (the summation, from $i = 1$ to $i = n$ of $e \times f$); and
 - i. the total daily OC emissions from all cleanup materials, in pounds per day ($g + h$).
6. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the number of hours of operation;
 - b. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per day (A.III.5.g + A.III.4.a);
 - c. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the average hourly emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per hour (A.III.6.b/A.III.6.a);
 - d. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are not photochemically reactive materials, in pounds per day (A.III.5.h);
 - e. for each day during which no photochemically reactive material was used for any of the final products and/or any of the cleanup materials, the total daily emissions from all final products and all cleanup materials, in pounds per day (A.III.5.h + A.III.4.b);
 - f. for each day during which no photochemically reactive material was used for any of the final products and/or any of the cleanup materials, the average hourly emissions from all final products and all cleanup materials, in pounds per hour (A.III.6.e/ A.III.6.a); and
 - g. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions for all final products and all cleanup materials, in pounds per day (A.III.6.b + A.III.6.d).
 7. The permittee shall record annually the OC emissions from this emissions unit and from emissions units P007 through P015, P018 through P020, and P024 through P036, combined. The annual emission (in tons) for this emissions unit shall be calculated by summing the values from A.III.6.e and A.III.6.g for the entire calendar year and then dividing by 2000.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 8 pounds per hour, and the actual average organic compound emission rate for each such day.
 - b. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - c. For the days during which no photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the emissions unit exceeded 50 pounds per hour, and the actual organic compound emission rate for each such day.
2. Each year, the permittee shall submit an annual report, by March 31, for the preceding calendar year. Each annual report shall specify the annual OC emissions for this emissions unit and for emissions units P007 through P015, P018 through P020, and P024 through P036, combined.

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V. Testing Requirements

1. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.
2. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.

3. Emission Limitation: On the days that no photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit no more than 50 (fifty) pounds per hour of organic compounds.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.

4. Emission Limitation: 75 tons OC per year from emissions units P007 through P015, P018 through P020, and P024 through P036, combined.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.

5. Formulation data shall be used to determine the organic compound contents of the materials employed for each final product and each cleanup material.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0243000241 Emissions Unit ID: P024 Issuance type: Title V Draft Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
500 gallon GLS reaction system, R-1000	None	None
2. Additional Terms and Conditions		
1. None		

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II. **Operational Restrictions**

1. When using chlorine, hydrogen chloride, hydrogen bromide and/or t-butylamine in this emissions unit, a scrubber shall be employed. The pH of the scrubber liquor shall be maintained at a pH of 10 or greater when using chlorine, hydrogen chloride and/or hydrogen bromide. The pH of the scrubber liquor shall be maintained at a pH of 3 or less when using t-butylamine.

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

1. The permit to install for this emissions unit (P024) was evaluated based on the actual materials employed and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant potentially emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-

hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each of the potential pollutants discharges from P024:

Pollutant: acetic acid

TLV (ug/m3): 25000

Maximum Hourly Emission Rate (lbs/hr): 1.7

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3)*: 124 (EF45) and 112 (EF76)

MAGLC (ug/m3): 2500

Pollutant: acetone

TLV (ug/m3): 1188000

Maximum Hourly Emission Rate (lbs/hr): 24.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1769 (EF45) and 1597 (EF76)

MAGLC (ug/m3): 118800

Pollutant: acetonitrile

TLV (ug/m3): 67000

Maximum Hourly Emission Rate (lbs/hr): 6.7

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 494 (EF45) and 446 (EF76)

MAGLC (ug/m3): 6700

Pollutant: t-butylamine

TLV (ug/m3): 11000

Maximum Hourly Emission Rate (lbs/hr): 0.05

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4 (EF45) and 3 (EF76)

MAGLC (ug/m3): 1100

Pollutant: chlorine

TLV (ug/m3): 1450

Maximum Hourly Emission Rate (lbs/hr): 0.13

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 10 (EF45) and 9 (EF76)

MAGLC (ug/m3): 145

Pollutant: cyclohexane

TLV (ug/m3): 1030000

Maximum Hourly Emission Rate (lbs/hr): 15.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1098 (EF45) and 991 (EF76)

MAGLC (ug/m3): 103000

Pollutant: diethyl ether

TLV (ug/m3): 1210000

Maximum Hourly Emission Rate (lbs/hr): 71.9

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 5267 (EF45) and 4754 (EF76)

MAGLC (ug/m3): 121000

Pollutant: dimethylformamide

TLV (ug/m3): 30000

Maximum Hourly Emission Rate (lbs/hr): 0.5

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 39 (EF45) and 35 (EF76)

MAGLC (ug/m3): 3000

Pollutant: ethyl acetate

TLV (ug/m3): 1440000

Maximum Hourly Emission Rate (lbs/hr): 14.8

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1085 (EF45) and 979 (EF76)

MAGLC (ug/m3): 144000

Pollutant: ethyl alcohol

TLV (ug/m3): 1880000

Maximum Hourly Emission Rate (lbs/hr): 4.9

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 362 (EF45) and 327 (EF76)

MAGLC (ug/m3): 188000

Pollutant: heptane

TLV (ug/m3): 1640000

Maximum Hourly Emission Rate (lbs/hr): 8.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 602 (EF45) and 544 (EF76)

MAGLC (ug/m3): 164000

Pollutant: hydrogen bromide

TLV (ug/m3): 7300

Maximum Hourly Emission Rate (lbs/hr): 1.28

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 94 (EF45) and 85 (EF76)

MAGLC (ug/m3): 730

Pollutant: hydrogen chloride

TLV (ug/m3): 5500

Maximum Hourly Emission Rate (lbs/hr): 0.15

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 11 (EF45) and 10 (EF76)

MAGLC (ug/m3): 550

Pollutant: isopropyl acetate

TLV (ug/m3): 1044000

Maximum Hourly Emission Rate (lbs/hr): 11.1

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 815 (EF45) and 736 (EF76)

MAGLC (ug/m3): 104400

Pollutant: isopropyl alcohol

TLV (ug/m3): 983000

Maximum Hourly Emission Rate (lbs/hr): 4.9

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 361 (EF45) and 326 (EF76)

MAGLC (ug/m3): 98300

Pollutant: methyl alcohol

TLV (ug/m3): 262000

Maximum Hourly Emission Rate (lbs/hr): 7.3

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 535 (EF45) and 483 (EF76)

MAGLC (ug/m3): 26200

Pollutant: methylamyl alcohol

TLV (ug/m3): 104000

Maximum Hourly Emission Rate (lbs/hr): 0.4

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 26 (EF45) and 23 (EF76)

MAGLC (ug/m3): 10400

Pollutant: methylene chloride

TLV (ug/m3): 174000

Maximum Hourly Emission Rate (lbs/hr): 35.5

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2598 (EF45) and 2345 (EF76)

MAGLC (ug/m3): 17400

Pollutant: methyl tert butyl ether

TLV (ug/m3): 144000

Maximum Hourly Emission Rate (lbs/hr): 20.6

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1506 (EF45) and 1359 (EF76)

MAGLC (ug/m3): 14400

Pollutant: pyridine

TLV (ug/m3): 16000

Maximum Hourly Emission Rate (lbs/hr): 3.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 217 (EF45) and 196 (EF76)

MAGLC (ug/m3): 1600

Pollutant: tetrahydrofuran

TLV (ug/m3): 590000

Maximum Hourly Emission Rate (lbs/hr): 21.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1538 (EF45) and 1389 (EF76)

MAGLC (ug/m3): 59000

Pollutant: toluene

TLV (ug/m3): 188000

Maximum Hourly Emission Rate (lbs/hr): 4.7

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 347 (EF45) and 313 (EF76)

MAGLC (ug/m3): 18800

* Emissions unit will discharge through either egress point EF45 or EF76, but not both simultaneously.

Physical changes to or changes in the method of operation of the emissions unit after its installation 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 be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

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

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

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

2. The permittee shall sum the predicted 1-hour maximum ground-level concentrations for each pollutant from emissions units P007 through P015, P018 through P020, and P024 through P036, to demonstrate

compliance with the "Air Toxic Policy". This sum shall take into account the actual equipment's operating schedule and equipment utilization. Comparison of the sum to the MAGLC shall be made to demonstrate compliance with the "Air Toxic Policy".

3. The permittee shall monitor the pH of the scrubber liquor while the emissions unit is being operated using chlorine, hydrogen chloride, hydrogen bromide and/or t-butylamine. The permittee shall collect and record the following information:
 - a. The pH of the scrubber liquor, on a daily basis.
 - b. A log or record of operating time for the emissions unit and the scrubber.

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IV. Reporting Requirements

1. The permittee shall submit quarterly pH deviation (excursion) reports that identify all periods of time during which the scrubber liquor pH did not comply with the pH requirements specified above.
2. The permittee shall submit quarterly reports that identify all periods of time during which chlorine, hydrogen chloride, hydrogen bromide, and/or t-butylamine were used in this emissions unit and a scrubber was not employed.

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0243000241 Emissions Unit ID: P025 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
100 gallon GLS reaction system, R-1300	OAC rule 3745-21-07(G)(2) OAC rule 3745-31-05(A)(3) PTI 02-13904	See A.I.2.a below. See A.I.2.b and A.I.2.c below.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).

2. Additional Terms and Conditions

- a. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day nor more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01. Emissions of organic materials from cleanup with photochemically reactive materials shall be included in the calculation of actual emissions when determining compliance with the 8 pounds per hour and 40 pounds per day limits.

- b. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are not employed, applied, evaporated, or dried, the permittee shall emit no more than 50 (fifty) pounds per hour of organic compounds.
- c. The emissions of organic compounds from emissions units P007 through P015, P018 through P020, and P024 through P036, combined, shall be limited to 75 (seventy five) tons per year.

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall keep the following daily records for all materials used in this emissions unit:
 - a. the identification of the chemical compound and its physical state; and
 - b. for any liquid organic materials, whether or not each material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).
- 2. The permittee shall develop an emission factor for the total amount of organic compounds emitted for each final product generated in this emissions unit. The emission factors shall be in units of pounds of organic compounds emitted per pound of final product generated. The permittee shall indicate whether or not each emission factor is based upon the use of any photochemically reactive materials. The permittee's calculation of each emission factor shall be subject to the review and approval of the Ohio EPA Northeast District Office.
- 3. The permittee shall collect and record the following information for each final product generated in this emissions unit:
 - a. the company identification for each final product generated;
 - b. whether or not any photochemically reactive materials were used to generate each final product;
 - c. the quantity of each final product generated, in pounds;
 - d. the emission factor for each final product generated, in pounds of organic compounds emitted per pound of final product generated;
 - e. the number of days the emissions unit was in operation to generate each final product; and
 - f. the average daily organic compound emission rate, in pounds per day (c x d)/e.
- 4. The permittee shall collect and record the following information each day for all final products generated in this emissions unit:
 - a. For each day during which any photochemically reactive material was used as a cleanup material and/or for one or more of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from i = 1 to i = n, of A.III.3.f).
 - b. For each day during which no photochemically reactive material was used as a cleanup material and/or for any of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from i = 1 to i = n, of A.III.3.f).
- 5. The permittee shall collect and record the following information for the cleanup materials employed each day in this emissions unit:
 - a. the company identification for each cleanup material;
 - b. whether or not each cleanup material is a photochemically reactive material;
 - c. the quantity of each cleanup material employed that is a photochemically reactive material, in gallons;
 - d. the OC content of each cleanup material employed that is a photochemically reactive material, in pounds per gallon;
 - e. the quantity of each cleanup material employed that is not a photochemically reactive material, in gallons;
 - f. the OC content of each cleanup material employed that is not a photochemically reactive material, in pounds per gallon;
 - g. the daily emissions of the cleanup materials that are photochemically reactive materials, in pounds per day (the summation, from i = 1 to i = n of c x d);
 - h. the daily emissions of the cleanup materials that are not photochemically reactive materials, in pounds per day (the summation, from i = 1 to i = n of e x f); and
 - i. the total daily OC emissions from all cleanup materials, in pounds per day (g + h).

6. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the number of hours of operation;
 - b. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per day (A.III.5.g + A.III.4.a);
 - c. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the average hourly emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per hour (A.III.6.b/A.III.6.a);
 - d. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are not photochemically reactive materials, in pounds per day (A.III.5.h);
 - e. for each day during which no photochemically reactive material was used for any of the final products and/or any of the cleanup materials, the total daily emissions from all final products and all cleanup materials, in pounds per day (A.III.5.h + A.III.4.b);
 - f. for each day during which no photochemically reactive material was used for any of the final products and/or any of the cleanup materials, the average hourly emissions from all final products and all cleanup materials, in pounds per hour (A.III.6.e/ A.III.6.a); and
 - g. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions for all final products and all cleanup materials, in pounds per day (A.III.6.b + A.III.6.d).
7. The permittee shall record annually the OC emissions from this emissions unit and from emissions units P007 through P015, P018 through P020, and P024 through P036, combined. The annual emission (in tons) for this emissions unit shall be calculated by summing the values from A.III.6.e and A.III.6.g for the entire calendar year and then dividing by 2000.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 8 pounds per hour, and the actual average organic compound emission rate for each such day.
 - b. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - c. For the days during which no photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the emissions unit exceeded 50 pounds per hour, and the actual organic compound emission rate for each such day.
2. Each year, the permittee shall submit an annual report, by March 31, for the preceding calendar year. Each annual report shall specify the annual OC emissions for this emissions unit and for emissions units P007 through P015, P018 through P020, and P024 through P036, combined.

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V. Testing Requirements

1. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.
2. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.
3. Emission Limitation: On the days that no photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit no more than 50 (fifty) pounds per hour of organic compounds.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.

4. Emission Limitation: 75 tons OC per year from emissions units P007 through P015, P018 through P020, and P024 through P036, combined.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.
5. Formulation data shall be used to determine the organic compound contents of the materials employed for each final product and each cleanup material.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0243000241 Issuance type: Title V Draft Permit

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Facility ID: 0243000241 Emissions Unit ID: P025 Issuance type: Title V Draft Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
100 gallon GLS reaction system, R-1300	None	None
2. Additional Terms and Conditions		
1. None		

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II. **Operational Restrictions**

1. When using chlorine, hydrogen chloride, hydrogen bromide and/or t-butylamine in this emissions unit, a scrubber shall be employed. The pH of the scrubber liquor shall be maintained at a pH of 10 or greater when using chlorine, hydrogen chloride and/or hydrogen bromide. The pH of the scrubber liquor shall be maintained at a pH of 3 or less when using t-butylamine.

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

1. The permit to install for this emissions unit (P025) was evaluated based on the actual materials employed and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant potentially emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each of the potential pollutants discharges from P025:

Pollutant: acetic acid
 TLV (ug/m3): 25000
 Maximum Hourly Emission Rate (lbs/hr): 0.5
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3)*: 33 (EF45) and 30 (EF76)
 MAGLC (ug/m3): 2500

Pollutant: acetone

TLV (ug/m3): 1188000

Maximum Hourly Emission Rate (lbs/hr): 6.5
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 475 (EF45) and 429 (EF76)
MAGLC (ug/m3): 118800

Pollutant: acetonitrile

TLV (ug/m3): 67000
Maximum Hourly Emission Rate (lbs/hr): 1.8
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 133 (EF45) and 120 (EF76)
MAGLC (ug/m3): 6700

Pollutant: t-butylamine

TLV (ug/m3): 11000
Maximum Hourly Emission Rate (lbs/hr): 0.05
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4 (EF45) and 3 (EF76)
MAGLC (ug/m3): 1100

Pollutant: chlorine

TLV (ug/m3): 1450
Maximum Hourly Emission Rate (lbs/hr): 0.026
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2 (EF45) and 2 (EF76)
MAGLC (ug/m3): 145

Pollutant: cyclohexane

TLV (ug/m3): 1030000
Maximum Hourly Emission Rate (lbs/hr): 4.0
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 295 (EF45) and 266 (EF76)
MAGLC (ug/m3): 103000

Pollutant: diethyl ether

TLV (ug/m3): 1210000
Maximum Hourly Emission Rate (lbs/hr): 19.3
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1413 (EF45) and 1276 (EF76)
MAGLC (ug/m3): 121000

Pollutant: dimethylformamide

TLV (ug/m3): 30000
Maximum Hourly Emission Rate (lbs/hr): 0.1
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 11 (EF45) and 10 (EF76)
MAGLC (ug/m3): 3000

Pollutant: ethyl acetate

TLV (ug/m3): 1440000
Maximum Hourly Emission Rate (lbs/hr): 4.0
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 291 (EF45) and 263 (EF76)
MAGLC (ug/m3): 144000

Pollutant: ethyl alcohol

TLV (ug/m3): 1880000
Maximum Hourly Emission Rate (lbs/hr): 1.3
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 97 (EF45) and 88 (EF76)
MAGLC (ug/m3): 188000

Pollutant: heptane

TLV (ug/m3): 1640000
Maximum Hourly Emission Rate (lbs/hr): 2.2
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 162 (EF45) and 146 (EF76)
MAGLC (ug/m3): 164000

Pollutant: hydrogen bromide

TLV (ug/m3): 7300
Maximum Hourly Emission Rate (lbs/hr): 0.26
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 19 (EF45) and 17 (EF76)
MAGLC (ug/m3): 730

Pollutant: hydrogen chloride

TLV (ug/m3): 5500
Maximum Hourly Emission Rate (lbs/hr): 0.03
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2 (EF45) and 2 (EF76)
MAGLC (ug/m3): 550

Pollutant: isopropyl acetate

TLV (ug/m3): 1044000
Maximum Hourly Emission Rate (lbs/hr): 3.0
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 219 (EF45) and 197 (EF76)
MAGLC (ug/m3): 104400

Pollutant: isopropyl alcohol

TLV (ug/m3): 983000
Maximum Hourly Emission Rate (lbs/hr): 1.3
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 97 (EF45) and 87 (EF76)
MAGLC (ug/m3): 98300

Pollutant: methyl alcohol

TLV (ug/m3): 262000
Maximum Hourly Emission Rate (lbs/hr): 2.0
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 143 (EF45) and 130 (EF76)
MAGLC (ug/m3): 26200

Pollutant: methylamyl alcohol
 TLV (ug/m3): 104000
 Maximum Hourly Emission Rate (lbs/hr): 0.1
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 7 (EF45) and 6 (EF76)
 MAGLC (ug/m3): 10400

Pollutant: methylene chloride
 TLV (ug/m3): 174000
 Maximum Hourly Emission Rate (lbs/hr): 9.5
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 697 (EF45) and 629 (EF76)
 MAGLC (ug/m3): 17400

Pollutant: methyl tert butyl ether
 TLV (ug/m3): 144000
 Maximum Hourly Emission Rate (lbs/hr): 5.5
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 404 (EF45) and 365 (EF76)
 MAGLC (ug/m3): 14400

Pollutant: pyridine
 TLV (ug/m3): 16000
 Maximum Hourly Emission Rate (lbs/hr): 0.8
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 58 (EF45) and 53 (EF76)
 MAGLC (ug/m3): 1600

Pollutant: tetrahydrofuran
 TLV (ug/m3): 590000
 Maximum Hourly Emission Rate (lbs/hr): 5.6
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 413 (EF45) and 373 (EF76)
 MAGLC (ug/m3): 59000

Pollutant: toluene
 TLV (ug/m3): 188000
 Maximum Hourly Emission Rate (lbs/hr): 1.3
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 93 (EF45) and 84 (EF76)
 MAGLC (ug/m3): 18800

* Emissions unit will discharge through either egress point EF45 or EF76, but not both simultaneously.

Physical changes to or changes in the method of operation of the emissions unit after its installation 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 be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
 If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
2. The permittee shall sum the predicted 1-hour maximum ground-level concentrations for each pollutant from emissions units P007 through P015, P018 through P020, and P024 through P036, to demonstrate compliance with the "Air Toxic Policy". This sum shall take into account the actual equipment's operating schedule and equipment utilization. Comparison of the sum to the MAGLC shall be made to demonstrate compliance with the "Air Toxic Policy".
 3. The permittee shall monitor the pH of the scrubber liquor while the emissions unit is being operated using chlorine, hydrogen chloride, hydrogen bromide and/or t-butylamine. The permittee shall collect and record the following information:
 - a. The pH of the scrubber liquor, on a daily basis.
 - b. A log or record of operating time for the emissions unit and the scrubber.

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IV. Reporting Requirements

1. The permittee shall submit quarterly pH deviation (excursion) reports that identify all periods of time during which the scrubber liquor pH did not comply with the pH requirements specified above.
2. The permittee shall submit quarterly reports that identify all periods of time during which chlorine, hydrogen chloride, hydrogen bromide, and/or t-butylamine were used in this emissions unit and a scrubber was not employed.

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0243000241 Emissions Unit ID: P026 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
500 gallon GLS reaction system, R-1400	OAC rule 3745-21-07(G)(2) OAC rule 3745-31-05(A)(3) PTI 02-13904	See A.I.2.a below. See A.I.2.b and A.I.2.c below.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).

2. Additional Terms and Conditions

- a. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day nor more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01. Emissions of organic materials from cleanup with photochemically reactive materials shall be included in the calculation of actual emissions when determining compliance with the 8 pounds per hour and 40 pounds per day limits.
- b. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are not employed, applied, evaporated, or dried, the permittee shall emit no more than 50 (fifty) pounds per hour of organic compounds.
- c. The emissions of organic compounds from emissions units P007 through P015, P018 through P020, and P024 through P036, combined, shall be limited to 75 (seventy five) tons per year.

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall keep the following daily records for all materials used in this emissions unit:
 - a. the identification of the chemical compound and its physical state; and
 - b. for any liquid organic materials, whether or not each material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall develop an emission factor for the total amount of organic compounds emitted for each final product generated in this emissions unit. The emission factors shall be in units of pounds of organic compounds emitted per pound of final product generated. The permittee shall indicate whether or not each emission factor is based upon the use of any photochemically reactive materials. The permittee's calculation of each emission factor shall be subject to the review and approval of the Ohio EPA Northeast District Office.
3. The permittee shall collect and record the following information for each final product generated in this emissions unit:
 - a. the company identification for each final product generated;
 - b. whether or not any photochemically reactive materials were used to generate each final product;
 - c. the quantity of each final product generated, in pounds;
 - d. the emission factor for each final product generated, in pounds of organic compounds emitted per pound of final product generated;
 - e. the number of days the emissions unit was in operation to generate each final product; and
 - f. the average daily organic compound emission rate, in pounds per day (c x d)/e.
4. The permittee shall collect and record the following information each day for all final products generated in this emissions unit:
 - a. For each day during which any photochemically reactive material was used as a cleanup material and/or for one or more of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from i = 1 to i = n, of A.III.3.f).
 - b. For each day during which no photochemically reactive material was used as a cleanup material and/or for any of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from i = 1 to i = n, of A.III.3.f).
5. The permittee shall collect and record the following information for the cleanup materials employed each day in this emissions unit:
 - a. the company identification for each cleanup material;
 - b. whether or not each cleanup material is a photochemically reactive material;
 - c. the quantity of each cleanup material employed that is a photochemically reactive material, in gallons;
 - d. the OC content of each cleanup material employed that is a photochemically reactive material, in pounds per gallon;
 - e. the quantity of each cleanup material employed that is not a photochemically reactive material, in gallons;
 - f. the OC content of each cleanup material employed that is not a photochemically reactive material, in pounds per gallon;
 - g. the daily emissions of the cleanup materials that are photochemically reactive materials, in pounds per day (the summation, from i = 1 to i = n of c x d);
 - h. the daily emissions of the cleanup materials that are not photochemically reactive materials, in pounds per day (the summation, from i = 1 to i = n of e x f); and
 - i. the total daily OC emissions from all cleanup materials, in pounds per day (g + h).
6. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the number of hours of operation;
 - b. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per day (A.III.5.g + A.III.4.a);
 - c. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the average hourly emissions from all the cleanup materials that

- are photochemically reactive materials and all the final products, in pounds per hour (A.III.6.b/A.III.6.a);
- d. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are not photochemically reactive materials, in pounds per day (A.III.5.h);
 - e. for each day during which no photochemically reactive material was used for any of the final products and/or any of the cleanup materials, the total daily emissions from all final products and all cleanup materials, in pounds per day (A.III.5.h + A.III.4.b);
 - f. for each day during which no photochemically reactive material was used for any of the final products and/or any of the cleanup materials, the average hourly emissions from all final products and all cleanup materials, in pounds per hour (A.III.6.e/ A.III.6.a); and
 - g. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions for all final products and all cleanup materials, in pounds per day (A.III.6.b + A.III.6.d).
7. The permittee shall record annually the OC emissions from this emissions unit and from emissions units P007 through P015, P018 through P020, and P024 through P036, combined. The annual emission (in tons) for this emissions unit shall be calculated by summing the values from A.III.6.e and A.III.6.g for the entire calendar year and then dividing by 2000.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 8 pounds per hour, and the actual average organic compound emission rate for each such day.
 - b. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - c. For the days during which no photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the emissions unit exceeded 50 pounds per hour, and the actual organic compound emission rate for each such day.
2. Each year, the permittee shall submit an annual report, by March 31, for the preceding calendar year. Each annual report shall specify the annual OC emissions for this emissions unit and for emissions units P007 through P015, P018 through P020, and P024 through P036, combined.

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V. Testing Requirements

1. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.
2. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.
3. Emission Limitation: On the days that no photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit no more than 50 (fifty) pounds per hour of organic compounds.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.
4. Emission Limitation: 75 tons OC per year from emissions units P007 through P015, P018 through P020, and P024 through P036, combined.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.
5. Formulation data shall be used to determine the organic compound contents of the materials employed for each final product and each cleanup material.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0243000241 Emissions Unit ID: P026 Issuance type: Title V Draft Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
500 gallon GLS reaction system, R-1400	None	None
2. Additional Terms and Conditions		
1. None		

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II. **Operational Restrictions**

1. None

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

1. The permit to install for this emissions unit (P026) was evaluated based on the actual materials employed and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant potentially emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each of the potential pollutants discharges from P026:

Pollutant: acetic acid
 TLV (ug/m3): 25000
 Maximum Hourly Emission Rate (lbs/hr): 1.7
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3)*: 124 (EF45) and 112 (EF76)
 MAGLC (ug/m3): 2500

Pollutant: acetone
 TLV (ug/m3): 1188000
 Maximum Hourly Emission Rate (lbs/hr): 24.2
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1769 (EF45) and 1597 (EF76)
 MAGLC (ug/m3): 118800

Pollutant: acetonitrile
 TLV (ug/m3): 67000
 Maximum Hourly Emission Rate (lbs/hr): 6.7
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 494 (EF45) and 446 (EF76)
 MAGLC (ug/m3): 6700

Pollutant: t-butylamine
 TLV (ug/m3): 11000
 Maximum Hourly Emission Rate (lbs/hr): 0.05
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4 (EF45) and 3 (EF76)
 MAGLC (ug/m3): 1100

Pollutant: cyclohexane
TLV (ug/m3): 1030000
Maximum Hourly Emission Rate (lbs/hr): 15.0
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1098 (EF45) and 991 (EF76)
MAGLC (ug/m3): 103000

Pollutant: diethyl ether
TLV (ug/m3): 1210000
Maximum Hourly Emission Rate (lbs/hr): 71.9
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 5267 (EF45) and 4754 (EF76)
MAGLC (ug/m3): 121000

Pollutant: dimethylformamide
TLV (ug/m3): 30000
Maximum Hourly Emission Rate (lbs/hr): 0.5
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 39 (EF45) and 35 (EF76)
MAGLC (ug/m3): 3000

Pollutant: ethyl acetate
TLV (ug/m3): 1440000
Maximum Hourly Emission Rate (lbs/hr): 14.8
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1085 (EF45) and 979 (EF76)
MAGLC (ug/m3): 144000

Pollutant: ethyl alcohol
TLV (ug/m3): 1880000
Maximum Hourly Emission Rate (lbs/hr): 4.9
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 362 (EF45) and 327 (EF76)
MAGLC (ug/m3): 188000

Pollutant: heptane
TLV (ug/m3): 1640000
Maximum Hourly Emission Rate (lbs/hr): 8.2
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 602 (EF45) and 544 (EF76)
MAGLC (ug/m3): 164000
Pollutant: isopropyl acetate
TLV (ug/m3): 1044000
Maximum Hourly Emission Rate (lbs/hr): 11.1
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 815 (EF45) and 736 (EF76)
MAGLC (ug/m3): 104400

Pollutant: isopropyl alcohol
TLV (ug/m3): 983000
Maximum Hourly Emission Rate (lbs/hr): 4.9
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 361 (EF45) and 326 (EF76)
MAGLC (ug/m3): 98300

Pollutant: methyl alcohol
TLV (ug/m3): 262000
Maximum Hourly Emission Rate (lbs/hr): 7.3
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 535 (EF45) and 483 (EF76)
MAGLC (ug/m3): 26200

Pollutant: methylamyl alcohol
TLV (ug/m3): 104000
Maximum Hourly Emission Rate (lbs/hr): 0.4
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 26 (EF45) and 23 (EF76)
MAGLC (ug/m3): 10400

Pollutant: methylene chloride
TLV (ug/m3): 174000
Maximum Hourly Emission Rate (lbs/hr): 35.5
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2598 (EF45) and 2345 (EF76)
MAGLC (ug/m3): 17400

Pollutant: methyl tert butyl ether
TLV (ug/m3): 144000
Maximum Hourly Emission Rate (lbs/hr): 20.6
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1506 (EF45) and 1359 (EF76)
MAGLC (ug/m3): 14400

Pollutant: pyridine
TLV (ug/m3): 16000
Maximum Hourly Emission Rate (lbs/hr): 3.0
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 217 (EF45) and 196 (EF76)
MAGLC (ug/m3): 1600
Pollutant: tetrahydrofuran
TLV (ug/m3): 590000
Maximum Hourly Emission Rate (lbs/hr): 21.0
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1538 (EF45) and 1389 (EF76)
MAGLC (ug/m3): 59000

Pollutant: toluene
TLV (ug/m3): 188000
Maximum Hourly Emission Rate (lbs/hr): 4.7

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 347 (EF45) and 313 (EF76)
MAGLC (ug/m3): 18800

* Emissions unit will discharge through either egress point EF45 or EF76, but not both simultaneously.

Physical changes to or changes in the method of operation of the emissions unit after its installation 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 be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

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

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

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

2. The permittee shall sum the predicted 1-hour maximum ground-level concentrations for each pollutant from emissions units P007 through P015, P018 through P020, and P024 through P036, to demonstrate compliance with the "Air Toxic Policy". This sum shall take into account the actual equipment's operating schedule and equipment utilization. Comparison of the sum to the MAGLC shall be made to demonstrate compliance with the "Air Toxic Policy".

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0243000241 Emissions Unit ID: P027 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
750 gallon SS reaction system, R-8300	OAC rule 3745-21-07(G)(2) OAC rule 3745-31-05(A)(3) PTI 02-13904	See A.I.2.a below. See A.I.2.b and A.I.2.c below.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).

2. Additional Terms and Conditions

- a. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day nor more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01. Emissions of organic materials from cleanup with photochemically reactive materials shall be included in the calculation of actual emissions when determining compliance with the 8 pounds per hour and 40 pounds per day limits.
- b. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are not employed, applied, evaporated, or dried, the permittee shall emit no more than 50 (fifty) pounds per hour of organic compounds.
- c. The emissions of organic compounds from emissions units P007 through P015, P018 through P020, and P024 through P036, combined, shall be limited to 75 (seventy five) tons per year.

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall keep the following daily records for all materials used in this emissions unit:
 - a. the identification of the chemical compound and its physical state; and
 - b. for any liquid organic materials, whether or not each material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall develop an emission factor for the total amount of organic compounds emitted for each final product generated in this emissions unit. The emission factors shall be in units of pounds of organic compounds emitted per pound of final product generated. The permittee shall indicate whether or not each emission factor is based upon the use of any photochemically reactive materials. The permittee's calculation of each emission factor shall be subject to the review and approval of the Ohio EPA Northeast District Office.
3. The permittee shall collect and record the following information for each final product generated in this emissions unit:
 - a. the company identification for each final product generated;
 - b. whether or not any photochemically reactive materials were used to generate each final product;
 - c. the quantity of each final product generated, in pounds;
 - d. the emission factor for each final product generated, in pounds of organic compounds emitted per pound of final product generated;
 - e. the number of days the emissions unit was in operation to generate each final product; and
 - f. the average daily organic compound emission rate, in pounds per day (c x d)/e.
4. The permittee shall collect and record the following information each day for all final products generated in this emissions unit:
 - a. For each day during which any photochemically reactive material was used as a cleanup material and/or for one or more of the final products, the total average daily emissions from all final products produced

- that day, in pounds per day (the summation, from $i = 1$ to $i = n$, of A.III.3.f).
- b. For each day during which no photochemically reactive material was used as a cleanup material and/or for any of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from $i = 1$ to $i = n$, of A.III.3.f).
5. The permittee shall collect and record the following information for the cleanup materials employed each day in this emissions unit:
 - a. the company identification for each cleanup material;
 - b. whether or not each cleanup material is a photochemically reactive material;
 - c. the quantity of each cleanup material employed that is a photochemically reactive material, in gallons;
 - d. the OC content of each cleanup material employed that is a photochemically reactive material, in pounds per gallon;
 - e. the quantity of each cleanup material employed that is not a photochemically reactive material, in gallons;
 - f. the OC content of each cleanup material employed that is not a photochemically reactive material, in pounds per gallon;
 - g. the daily emissions of the cleanup materials that are photochemically reactive materials, in pounds per day (the summation, from $i = 1$ to $i = n$ of $c \times d$);
 - h. the daily emissions of the cleanup materials that are not photochemically reactive materials, in pounds per day (the summation, from $i = 1$ to $i = n$ of $e \times f$); and
 - i. the total daily OC emissions from all cleanup materials, in pounds per day ($g + h$).
 6. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the number of hours of operation;
 - b. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per day (A.III.5.g + A.III.4.a);
 - c. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the average hourly emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per hour (A.III.6.b/A.III.6.a);
 - d. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are not photochemically reactive materials, in pounds per day (A.III.5.h);
 - e. for each day during which no photochemically reactive material was used for any of the final products and/or any of the cleanup materials, the total daily emissions from all final products and all cleanup materials, in pounds per day (A.III.5.h + A.III.4.b);
 - f. for each day during which no photochemically reactive material was used for any of the final products and/or any of the cleanup materials, the average hourly emissions from all final products and all cleanup materials, in pounds per hour (A.III.6.e/ A.III.6.a); and
 - g. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions for all final products and all cleanup materials, in pounds per day (A.III.6.b + A.III.6.d).
 7. The permittee shall record annually the OC emissions from this emissions unit and from emissions units P007 through P015, P018 through P020, and P024 through P036, combined. The annual emission (in tons) for this emissions unit shall be calculated by summing the values from A.III.6.e and A.III.6.g for the entire calendar year and then dividing by 2000.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 8 pounds per hour, and the actual average organic compound emission rate for each such day.
 - b. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - c. For the days during which no photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the emissions unit exceeded 50 pounds per hour, and the actual organic compound emission rate for each such day.
2. Each year, the permittee shall submit an annual report, by March 31, for the preceding calendar year. Each annual report shall specify the annual OC emissions for this emissions unit and for emissions units P007

through P015, P018 through P020, and P024 through P036, combined.

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V. **Testing Requirements**

1. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.
2. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.
3. Emission Limitation: On the days that no photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit no more than 50 (fifty) pounds per hour of organic compounds.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.
4. Emission Limitation: 75 tons OC per year from emissions units P007 through P015, P018 through P020, and P024 through P036, combined.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.
5. Formulation data shall be used to determine the organic compound contents of the materials employed for each final product and each cleanup material.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0243000241 Issuance type: Title V Draft Permit

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Facility ID: 0243000241 Emissions Unit ID: P027 Issuance type: Title V Draft Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
750 gallon SS reaction system, R-8300	None	None

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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

1. The permit to install for this emissions unit (P027) was evaluated based on the actual materials employed and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant potentially emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each of the potential pollutants discharges from P027:

Pollutant: acetic acid
TLV (ug/m3): 25000
Maximum Hourly Emission Rate (lbs/hr): 2.0
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3)*: 157 (EF45) and 142 (EF76)
MAGLC (ug/m3): 2500

Pollutant: acetone
TLV (ug/m3): 1188000
Maximum Hourly Emission Rate (lbs/hr): 30.7
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2244 (EF45) and 2026 (EF76)
MAGLC (ug/m3): 118800

Pollutant: acetonitrile
TLV (ug/m3): 67000
Maximum Hourly Emission Rate (lbs/hr): 8.6
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 626 (EF45) and 566 (EF76)
MAGLC (ug/m3): 6700

Pollutant: t-butylamine
TLV (ug/m3): 11000
Maximum Hourly Emission Rate (lbs/hr): 0.05
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4 (EF45) and 3 (EF76)
MAGLC (ug/m3): 1100

Pollutant: cyclohexane
TLV (ug/m3): 1030000
Maximum Hourly Emission Rate (lbs/hr): 19.0
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1393 (EF45) and 1257 (EF76)
MAGLC (ug/m3): 103000

Pollutant: diethyl ether
TLV (ug/m3): 1210000
Maximum Hourly Emission Rate (lbs/hr): 91.2
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 6680 (EF45) and 6030 (EF76)
MAGLC (ug/m3): 121000

Pollutant: dimethylformamide
TLV (ug/m3): 30000
Maximum Hourly Emission Rate (lbs/hr): 0.7
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 50 (EF45) and 45 (EF76)
MAGLC (ug/m3): 3000

Pollutant: ethyl acetate
TLV (ug/m3): 1440000
Maximum Hourly Emission Rate (lbs/hr): 18.8
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1376 (EF45) and 1242 (EF76)
MAGLC (ug/m3): 144000

Pollutant: ethyl alcohol
TLV (ug/m3): 1880000
Maximum Hourly Emission Rate (lbs/hr): 6.3
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 459 (EF45) and 414 (EF76)
MAGLC (ug/m3): 188000

Pollutant: heptane
TLV (ug/m3): 1640000
Maximum Hourly Emission Rate (lbs/hr): 8.2
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 602 (EF45) and 544 (EF76)
MAGLC (ug/m3): 164000

Pollutant: isopropyl acetate
TLV (ug/m3): 1044000
Maximum Hourly Emission Rate (lbs/hr): 14.1
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1033 (EF45) and 933 (EF76)
MAGLC (ug/m3): 104400

Pollutant: isopropyl alcohol
TLV (ug/m3): 983000

Maximum Hourly Emission Rate (lbs/hr): 6.2
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 457 (EF45) and 413 (EF76)
 MAGLC (ug/m3): 98300

Pollutant: methyl alcohol
 TLV (ug/m3): 262000
 Maximum Hourly Emission Rate (lbs/hr): 9.3
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 678 (EF45) and 612 (EF76)
 MAGLC (ug/m3): 26200

Pollutant: methylamyl alcohol
 TLV (ug/m3): 104000
 Maximum Hourly Emission Rate (lbs/hr): 0.4
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 33 (EF45) and 30 (EF76)
 MAGLC (ug/m3): 10400

Pollutant: methylene chloride
 TLV (ug/m3): 174000
 Maximum Hourly Emission Rate (lbs/hr): 45.0
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3295 (EF45) and 2974 (EF76)
 MAGLC (ug/m3): 17400

Pollutant: methyl tert butyl ether
 TLV (ug/m3): 144000
 Maximum Hourly Emission Rate (lbs/hr): 26.1
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1910 (EF45) and 1724 (EF76)
 MAGLC (ug/m3): 14400

Pollutant: pyridine
 TLV (ug/m3): 16000
 Maximum Hourly Emission Rate (lbs/hr): 3.8
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 275 (EF45) and 249 (EF76)
 MAGLC (ug/m3): 1600

Pollutant: tetrahydrofuran
 TLV (ug/m3): 590000
 Maximum Hourly Emission Rate (lbs/hr): 26.7
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1951 (EF45) and 1762 (EF76)
 MAGLC (ug/m3): 59000

Pollutant: toluene
 TLV (ug/m3): 188000
 Maximum Hourly Emission Rate (lbs/hr): 6.0
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 440 (EF45) and 397 (EF76)
 MAGLC (ug/m3): 18800

* Emissions unit will discharge through either egress point EF45 or EF76, but not both simultaneously.

Physical changes to or changes in the method of operation of the emissions unit after its installation 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 be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
 If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
2. The permittee shall sum the predicted 1-hour maximum ground-level concentrations for each pollutant from emissions units P007 through P015, P018 through P020, and P024 through P036, to demonstrate compliance with the "Air Toxic Policy". This sum shall take into account the actual equipment's operating schedule and equipment utilization. Comparison of the sum to the MAGLC shall be made to demonstrate

compliance with the "Air Toxic Policy".

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0243000241 Emissions Unit ID: P028 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
500 gallon GLS reaction system, R-10000	OAC rule 3745-21-07(G)(2) OAC rule 3745-31-05(A)(3) PTI 02-13904	See A.I.2.a below. See A.I.2.b and A.I.2.c below.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).

2. Additional Terms and Conditions

- a. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day nor more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01. Emissions of organic materials from cleanup with photochemically reactive materials shall be included in the calculation of actual emissions when determining compliance with the 8 pounds per hour and 40 pounds per day limits.
- b. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are not employed, applied, evaporated, or dried, the permittee shall emit no more than 50 (fifty) pounds per hour of organic compounds.
- c. The emissions of organic compounds from emissions units P007 through P015, P018 through P020, and P024 through P036, combined, shall be limited to 75 (seventy five) tons per year.

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II. Operational Restrictions

- 1. None

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

1. The permittee shall keep the following daily records for all materials used in this emissions unit:
 - a. the identification of the chemical compound and its physical state; and
 - b. for any liquid organic materials, whether or not each material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall develop an emission factor for the total amount of organic compounds emitted for each final product generated in this emissions unit. The emission factors shall be in units of pounds of organic compounds emitted per pound of final product generated. The permittee shall indicate whether or not each emission factor is based upon the use of any photochemically reactive materials. The permittee's calculation of each emission factor shall be subject to the review and approval of the Ohio EPA Northeast District Office.
3. The permittee shall collect and record the following information for each final product generated in this emissions unit:
 - a. the company identification for each final product generated;
 - b. whether or not any photochemically reactive materials were used to generate each final product;
 - c. the quantity of each final product generated, in pounds;
 - d. the emission factor for each final product generated, in pounds of organic compounds emitted per pound of final product generated;
 - e. the number of days the emissions unit was in operation to generate each final product; and
 - f. the average daily organic compound emission rate, in pounds per day (c x d)/e.
4. The permittee shall collect and record the following information each day for all final products generated in this emissions unit:
 - a. For each day during which any photochemically reactive material was used as a cleanup material and/or for one or more of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from $i = 1$ to $i = n$, of A.III.3.f).
 - b. For each day during which no photochemically reactive material was used as a cleanup material and/or for any of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from $i = 1$ to $i = n$, of A.III.3.f).
5. The permittee shall collect and record the following information for the cleanup materials employed each day in this emissions unit:
 - a. the company identification for each cleanup material;
 - b. whether or not each cleanup material is a photochemically reactive material;
 - c. the quantity of each cleanup material employed that is a photochemically reactive material, in gallons;
 - d. the OC content of each cleanup material employed that is a photochemically reactive material, in pounds per gallon;
 - e. the quantity of each cleanup material employed that is not a photochemically reactive material, in gallons;
 - f. the OC content of each cleanup material employed that is not a photochemically reactive material, in pounds per gallon;
 - g. the daily emissions of the cleanup materials that are photochemically reactive materials, in pounds per day (the summation, from $i = 1$ to $i = n$ of c x d);
 - h. the daily emissions of the cleanup materials that are not photochemically reactive materials, in pounds per day (the summation, from $i = 1$ to $i = n$ of e x f); and
 - i. the total daily OC emissions from all cleanup materials, in pounds per day (g + h).
6. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the number of hours of operation;
 - b. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per day (A.III.5.g + A.III.4.a);
 - c. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the average hourly emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per hour (A.III.6.b/A.III.6.a);
 - d. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are

- not photochemically reactive materials, in pounds per day (A.III.5.h);
- e. for each day during which no photochemically reactive material was used for any of the final products and/or any of the cleanup materials, the total daily emissions from all final products and all cleanup materials, in pounds per day (A.III.5.h + A.III.4.b);
 - f. for each day during which no photochemically reactive material was used for any of the final products and/or any of the cleanup materials, the average hourly emissions from all final products and all cleanup materials, in pounds per hour (A.III.6.e/ A.III.6.a); and
 - g. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions for all final products and all cleanup materials, in pounds per day (A.III.6.b + A.III.6.d).
7. The permittee shall record annually the OC emissions from this emissions unit and from emissions units P007 through P015, P018 through P020, and P024 through P036, combined. The annual emission (in tons) for this emissions unit shall be calculated by summing the values from A.III.6.e and A.III.6.g for the entire calendar year and then dividing by 2000.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 8 pounds per hour, and the actual average organic compound emission rate for each such day.
 - b. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - c. For the days during which no photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the emissions unit exceeded 50 pounds per hour, and the actual organic compound emission rate for each such day.
2. Each year, the permittee shall submit an annual report, by March 31, for the preceding calendar year. Each annual report shall specify the annual OC emissions for this emissions unit and for emissions units P007 through P015, P018 through P020, and P024 through P036, combined.

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V. Testing Requirements

1. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.
2. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.
3. Emission Limitation: On the days that no photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit no more than 50 (fifty) pounds per hour of organic compounds.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.
4. Emission Limitation: 75 tons OC per year from emissions units P007 through P015, P018 through P020, and P024 through P036, combined.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.
5. Formulation data shall be used to determine the organic compound contents of the materials employed for each final product and each cleanup material.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0243000241 Emissions Unit ID: P028 Issuance type: Title V Draft Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
500 gallon GLS reaction system, R-10000	None	None
2. Additional Terms and Conditions		
<ol style="list-style-type: none"> 1. None 		

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II. Operational Restrictions

1. When using chlorine, hydrogen chloride, hydrogen bromide and/or t-butylamine in this emissions unit, a scrubber shall be employed. The pH of the scrubber liquor shall be maintained at a pH of 10 or greater when using chlorine, hydrogen chloride and/or hydrogen bromide. The pH of the scrubber liquor shall be maintained at a pH of 3 or less when using t-butylamine.

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III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit (P028) was evaluated based on the actual materials employed and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant potentially emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each of the potential pollutants discharges from P028:

Pollutant: acetic acid
 TLV (ug/m3): 25000
 Maximum Hourly Emission Rate (lbs/hr): 1.7
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3)*: 124 (EF45) and 112 (EF76)
 MAGLC (ug/m3): 2500

Pollutant: acetone
 TLV (ug/m3): 1188000
 Maximum Hourly Emission Rate (lbs/hr): 24.2
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1769 (EF45) and 1597 (EF76)
 MAGLC (ug/m3): 118800

Pollutant: acetonitrile
 TLV (ug/m3): 67000
 Maximum Hourly Emission Rate (lbs/hr): 6.7
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 494 (EF45) and 446 (EF76)
 MAGLC (ug/m3): 6700

Pollutant: t-butylamine
 TLV (ug/m3): 11000
 Maximum Hourly Emission Rate (lbs/hr): 0.05
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4 (EF45) and 3 (EF76)
 MAGLC (ug/m3): 1100

Pollutant: chlorine
TLV (ug/m3): 1450
Maximum Hourly Emission Rate (lbs/hr): 0.13
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 10 (EF45) and 9 (EF76)
MAGLC (ug/m3): 145

Pollutant: cyclohexane
TLV (ug/m3): 1030000
Maximum Hourly Emission Rate (lbs/hr): 15.0
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1098 (EF45) and 991 (EF76)
MAGLC (ug/m3): 103000

Pollutant: diethyl ether
TLV (ug/m3): 1210000
Maximum Hourly Emission Rate (lbs/hr): 71.9
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 5267 (EF45) and 4754 (EF76)
MAGLC (ug/m3): 121000

Pollutant: dimethylformamide
TLV (ug/m3): 30000
Maximum Hourly Emission Rate (lbs/hr): 0.5
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 39 (EF45) and 35 (EF76)
MAGLC (ug/m3): 3000

Pollutant: ethyl acetate
TLV (ug/m3): 1440000
Maximum Hourly Emission Rate (lbs/hr): 14.8
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1085 (EF45) and 979 (EF76)
MAGLC (ug/m3): 144000

Pollutant: ethyl alcohol
TLV (ug/m3): 1880000
Maximum Hourly Emission Rate (lbs/hr): 4.9
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 362 (EF45) and 327 (EF76)
MAGLC (ug/m3): 188000

Pollutant: heptane
TLV (ug/m3): 1640000
Maximum Hourly Emission Rate (lbs/hr): 8.2
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 602 (EF45) and 544 (EF76)
MAGLC (ug/m3): 164000

Pollutant: hydrogen bromide
TLV (ug/m3): 7300
Maximum Hourly Emission Rate (lbs/hr): 1.28
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 94 (EF45) and 85 (EF76)
MAGLC (ug/m3): 730

Pollutant: hydrogen chloride
TLV (ug/m3): 5500
Maximum Hourly Emission Rate (lbs/hr): 0.15
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 11 (EF45) and 10 (EF76)
MAGLC (ug/m3): 550

Pollutant: isopropyl acetate
TLV (ug/m3): 1044000
Maximum Hourly Emission Rate (lbs/hr): 11.1
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 815 (EF45) and 736 (EF76)
MAGLC (ug/m3): 104400

Pollutant: isopropyl alcohol
TLV (ug/m3): 983000
Maximum Hourly Emission Rate (lbs/hr): 4.9
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 361 (EF45) and 326 (EF76)
MAGLC (ug/m3): 98300

Pollutant: methyl alcohol
TLV (ug/m3): 262000
Maximum Hourly Emission Rate (lbs/hr): 7.3
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 535 (EF45) and 483 (EF76)
MAGLC (ug/m3): 26200

Pollutant: methylamyl alcohol
TLV (ug/m3): 104000
Maximum Hourly Emission Rate (lbs/hr): 0.4
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 26 (EF45) and 23 (EF76)
MAGLC (ug/m3): 10400

Pollutant: methylene chloride
TLV (ug/m3): 174000
Maximum Hourly Emission Rate (lbs/hr): 35.5
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2598 (EF45) and 2345 (EF76)
MAGLC (ug/m3): 17400

Pollutant: methyl tert butyl ether
TLV (ug/m3): 144000

Maximum Hourly Emission Rate (lbs/hr): 20.6
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1506 (EF45) and 1359 (EF76)
 MAGLC (ug/m3): 14400

Pollutant: pyridine
 TLV (ug/m3): 16000
 Maximum Hourly Emission Rate (lbs/hr): 3.0
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 217 (EF45) and 196 (EF76)
 MAGLC (ug/m3): 1600

Pollutant: tetrahydrofuran
 TLV (ug/m3): 590000
 Maximum Hourly Emission Rate (lbs/hr): 21.0
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1538 (EF45) and 1389 (EF76)
 MAGLC (ug/m3): 59000

Pollutant: toluene
 TLV (ug/m3): 188000
 Maximum Hourly Emission Rate (lbs/hr): 4.7
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 347 (EF45) and 313 (EF76)
 MAGLC (ug/m3): 18800

* Emissions unit will discharge through either egress point EF45 or EF76, but not both simultaneously.

Physical changes to or changes in the method of operation of the emissions unit after its installation 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 be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

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

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

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

2. The permittee shall sum the predicted 1-hour maximum ground-level concentrations for each pollutant from emissions units P007 through P015, P018 through P020, and P024 through P036, to demonstrate compliance with the "Air Toxic Policy". This sum shall take into account the actual equipment's operating schedule and equipment utilization. Comparison of the sum to the MAGLC shall be made to demonstrate compliance with the "Air Toxic Policy".

3. The permittee shall monitor the pH of the scrubber liquor while the emissions unit is being operated using chlorine, hydrogen chloride, hydrogen bromide and/or t-butylamine. The permittee shall collect and record the following information:

a. The pH of the scrubber liquor, on a daily basis.

b. A log or record of operating time for the emissions unit and the scrubber.

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IV. Reporting Requirements

1. The permittee shall submit quarterly pH deviation (excursion) reports that identify all periods of time during which the scrubber liquor pH did not comply with the pH requirements specified above.

2. The permittee shall submit quarterly reports that identify all periods of time during which chlorine, hydrogen chloride, hydrogen bromide, and/or t-butylamine were used in this emissions unit and a scrubber was not employed.

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0243000241 Emissions Unit ID: P029 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
500 gallon GLS reaction system, R-17000	OAC rule 3745-21-07(G)(2) OAC rule 3745-31-05(A)(3) PTI 02-13904	See A.I.2.a below. See A.I.2.b and A.I.2.c below.
	OAC rule 3745-31-28	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2). None. See A.I.2.d below.

2. **Additional Terms and Conditions**

- a. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day nor more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01. Emissions of organic materials from cleanup with photochemically reactive materials shall be included in the calculation of actual emissions when determining compliance with the 8 pounds per hour and 40 pounds per day limits.
- b. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are not employed, applied, evaporated, or dried, the permittee shall emit no more than 50 (fifty) pounds per hour of organic compounds.
- c. The emissions of organic compounds from emissions units P007 through P015, P018 through P020, and P024 through P036, combined, shall be limited to 75 (seventy five) tons per year.
- d. This emissions unit is exempt from the requirements of OAC rule 3745-31-28 pursuant to the exemption in OAC rule 3745-31-28(C)(5) for any major MACT source that is a research and development activity.

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II. **Operational Restrictions**

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall keep the following daily records for all materials used in this emissions unit:
 - a. the identification of the chemical compound and its physical state; and
 - b. for any liquid organic materials, whether or not each material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall develop an emission factor for the total amount of organic compounds emitted for each final product generated in this emissions unit. The emission factors shall be in units of pounds of organic compounds emitted per pound of final product generated. The permittee shall indicate whether or not each emission factor is based upon the use of any photochemically reactive materials. The permittee's calculation of each emission factor shall be subject to the review and approval of the Ohio EPA Northeast District Office.
3. The permittee shall collect and record the following information for each final product generated in this emissions unit:
 - a. the company identification for each final product generated;
 - b. whether or not any photochemically reactive materials were used to generate each final product;
 - c. the quantity of each final product generated, in pounds;
 - d. the emission factor for each final product generated, in pounds of organic compounds emitted per pound of final product generated;
 - e. the number of days the emissions unit was in operation to generate each final product; and
 - f. the average daily organic compound emission rate, in pounds per day (c x d)/e.
4. The permittee shall collect and record the following information each day for all final products generated in this emissions unit:
 - a. For each day during which any photochemically reactive material was used as a cleanup material and/or for one or more of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from $i = 1$ to $i = n$, of A.III.3.f).
 - b. For each day during which no photochemically reactive material was used as a cleanup material and/or for any of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from $i = 1$ to $i = n$, of A.III.3.f).
5. The permittee shall collect and record the following information for the cleanup materials employed each day in this emissions unit:
 - a. the company identification for each cleanup material;
 - b. whether or not each cleanup material is a photochemically reactive material;
 - c. the quantity of each cleanup material employed that is a photochemically reactive material, in gallons;
 - d. the OC content of each cleanup material employed that is a photochemically reactive material, in pounds per gallon;
 - e. the quantity of each cleanup material employed that is not a photochemically reactive material, in gallons;
 - f. the OC content of each cleanup material employed that is not a photochemically reactive material, in pounds per gallon;
 - g. the daily emissions of the cleanup materials that are photochemically reactive materials, in pounds per day (the summation, from $i = 1$ to $i = n$ of c x d);
 - h. the daily emissions of the cleanup materials that are not photochemically reactive materials, in pounds per day (the summation, from $i = 1$ to $i = n$ of e x f); and
 - i. the total daily OC emissions from all cleanup materials, in pounds per day (g + h).
6. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the number of hours of operation;
 - b. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per day (A.III.5.g + A.III.4.a);
 - c. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the average hourly emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per hour (A.III.6.b/A.III.6.a);
 - d. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are not photochemically reactive materials, in pounds per day (A.III.5.h);
 - e. for each day during which no photochemically reactive material was used for any of the final products and/or any of the cleanup materials, the total daily emissions from all final products and all cleanup

materials, in pounds per day (A.III.5.h + A.III.4.b);

- f. for each day during which no photochemically reactive material was used for any of the final products and/or any of the cleanup materials, the average hourly emissions from all final products and all cleanup materials, in pounds per hour (A.III.6.e/ A.III.6.a); and
 - g. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions for all final products and all cleanup materials, in pounds per day (A.III.6.b + A.III.6.d).
7. The permittee shall record annually the OC emissions from this emissions unit and from emissions units P007 through P015, P018 through P020, and P024 through P036, combined. The annual emission (in tons) for this emissions unit shall be calculated by summing the values from A.III.6.e and A.III.6.g for the entire calendar year and then dividing by 2000.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 8 pounds per hour, and the actual average organic compound emission rate for each such day.
 - b. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - c. For the days during which no photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the emissions unit exceeded 50 pounds per hour, and the actual organic compound emission rate for each such day.
2. Each year, the permittee shall submit an annual report, by March 31, for the preceding calendar year. Each annual report shall specify the annual OC emissions for this emissions unit and for emissions units P007 through P015, P018 through P020, and P024 through P036, combined.

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V. Testing Requirements

1. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.
2. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.
3. Emission Limitation: On the days that no photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit no more than 50 (fifty) pounds per hour of organic compounds.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.
4. Emission Limitation: 75 tons OC per year from emissions units P007 through P015, P018 through P020, and P024 through P036, combined.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.
5. Formulation data shall be used to determine the organic compound contents of the materials employed for each final product and each cleanup material.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0243000241 Emissions Unit ID: P029 Issuance type: Title V Draft Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
500 gallon GLS reaction system, R-17000	None	None
2. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

- 1. When using chlorine, hydrogen chloride, hydrogen bromide and/or t-butylamine in this emissions unit, a scrubber shall be employed. The pH of the scrubber liquor shall be maintained at a pH of 10 or greater when using chlorine, hydrogen chloride and/or hydrogen bromide. The pH of the scrubber liquor shall be maintained at a pH of 3 or less when using t-butylamine.

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III. Monitoring and/or Record Keeping Requirements

- 1. The permit to install for this emissions unit (P029) was evaluated based on the actual materials employed and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant potentially emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each of the potential pollutants discharges from P029:

Pollutant: acetic acid
 TLV (ug/m3): 25000
 Maximum Hourly Emission Rate (lbs/hr): 1.7
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3)*: 124 (EF45) and 112 (EF76)
 MAGLC (ug/m3): 2500

Pollutant: acetone
 TLV (ug/m3): 1188000
 Maximum Hourly Emission Rate (lbs/hr): 24.2
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1769 (EF45) and 1597 (EF76)
 MAGLC (ug/m3): 118800

Pollutant: acetonitrile
 TLV (ug/m3): 67000
 Maximum Hourly Emission Rate (lbs/hr): 6.7
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 494 (EF45) and 446 (EF76)
 MAGLC (ug/m3): 6700

Pollutant: t-butylamine
 TLV (ug/m3): 11000
 Maximum Hourly Emission Rate (lbs/hr): 0.05
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4 (EF45) and 3 (EF76)
 MAGLC (ug/m3): 1100

Pollutant: chlorine
 TLV (ug/m3): 1450
 Maximum Hourly Emission Rate (lbs/hr): 0.13

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 10 (EF45) and 9 (EF76)
MAGLC (ug/m3): 145

Pollutant: cyclohexane
TLV (ug/m3): 1030000
Maximum Hourly Emission Rate (lbs/hr): 15.0
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1098 (EF45) and 991 (EF76)
MAGLC (ug/m3): 103000

Pollutant: diethyl ether
TLV (ug/m3): 1210000
Maximum Hourly Emission Rate (lbs/hr): 71.9
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 5267 (EF45) and 4754 (EF76)
MAGLC (ug/m3): 121000

Pollutant: dimethylformamide
TLV (ug/m3): 30000
Maximum Hourly Emission Rate (lbs/hr): 0.5
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 39 (EF45) and 35 (EF76)
MAGLC (ug/m3): 3000

Pollutant: ethyl acetate
TLV (ug/m3): 1440000
Maximum Hourly Emission Rate (lbs/hr): 14.8
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1085 (EF45) and 979 (EF76)
MAGLC (ug/m3): 144000

Pollutant: ethyl alcohol
TLV (ug/m3): 1880000
Maximum Hourly Emission Rate (lbs/hr): 4.9
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 362 (EF45) and 327 (EF76)
MAGLC (ug/m3): 188000

Pollutant: heptane
TLV (ug/m3): 1640000
Maximum Hourly Emission Rate (lbs/hr): 8.2
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 602 (EF45) and 544 (EF76)
MAGLC (ug/m3): 164000

Pollutant: hydrogen bromide
TLV (ug/m3): 7300
Maximum Hourly Emission Rate (lbs/hr): 1.28
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 94 (EF45) and 85 (EF76)
MAGLC (ug/m3): 730

Pollutant: hydrogen chloride
TLV (ug/m3): 5500
Maximum Hourly Emission Rate (lbs/hr): 0.15
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 11 (EF45) and 10 (EF76)
MAGLC (ug/m3): 550

Pollutant: isopropyl acetate
TLV (ug/m3): 1044000
Maximum Hourly Emission Rate (lbs/hr): 11.1
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 815 (EF45) and 736 (EF76)
MAGLC (ug/m3): 104400

Pollutant: isopropyl alcohol
TLV (ug/m3): 983000
Maximum Hourly Emission Rate (lbs/hr): 4.9
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 361 (EF45) and 326 (EF76)
MAGLC (ug/m3): 98300

Pollutant: methyl alcohol
TLV (ug/m3): 262000
Maximum Hourly Emission Rate (lbs/hr): 7.3
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 535 (EF45) and 483 (EF76)
MAGLC (ug/m3): 26200

Pollutant: methylamyl alcohol
TLV (ug/m3): 104000
Maximum Hourly Emission Rate (lbs/hr): 0.4
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 26 (EF45) and 23 (EF76)
MAGLC (ug/m3): 10400

Pollutant: methylene chloride
TLV (ug/m3): 174000
Maximum Hourly Emission Rate (lbs/hr): 35.5
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2598 (EF45) and 2345 (EF76)
MAGLC (ug/m3): 17400

Pollutant: methyl tert butyl ether
TLV (ug/m3): 144000
Maximum Hourly Emission Rate (lbs/hr): 20.6
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1506 (EF45) and 1359 (EF76)
MAGLC (ug/m3): 14400

Pollutant: pyridine

TLV (ug/m3): 16000

Maximum Hourly Emission Rate (lbs/hr): 3.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 217 (EF45) and 196 (EF76)

MAGLC (ug/m3): 1600

Pollutant: tetrahydrofuran

TLV (ug/m3): 590000

Maximum Hourly Emission Rate (lbs/hr): 21.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1538 (EF45) and 1389 (EF76)

MAGLC (ug/m3): 59000

Pollutant: toluene

TLV (ug/m3): 188000

Maximum Hourly Emission Rate (lbs/hr): 4.7

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 347 (EF45) and 313 (EF76)

MAGLC (ug/m3): 18800

* Emissions unit will discharge through either egress point EF45 or EF76, but not both simultaneously.

Physical changes to or changes in the method of operation of the emissions unit after its installation 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 be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

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

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

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

2. The permittee shall sum the predicted 1-hour maximum ground-level concentrations for each pollutant from emissions units P007 through P015, P018 through P020, and P024 through P036, to demonstrate compliance with the "Air Toxic Policy". This sum shall take into account the actual equipment's operating schedule and equipment utilization. Comparison of the sum to the MAGLC shall be made to demonstrate compliance with the "Air Toxic Policy".

3. The permittee shall monitor the pH of the scrubber liquor while the emissions unit is being operated using chlorine, hydrogen chloride, hydrogen bromide and/or t-butylamine. The permittee shall collect and record the following information:

a. The pH of the scrubber liquor, on a daily basis.

b. A log or record of operating time for the emissions unit and the scrubber.

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IV. Reporting Requirements

1. The permittee shall submit quarterly pH deviation (excursion) reports that identify all periods of time during which the scrubber liquor pH did not comply with the pH requirements specified above.

2. The permittee shall submit quarterly reports that identify all periods of time during which chlorine, hydrogen chloride, hydrogen bromide, and/or t-butylamine were used in this emissions unit and a scrubber was not employed.

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V. Testing Requirements

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0243000241 Emissions Unit ID: P030 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
LUWA wiped/thin film evaporator system, 1.4 square feet, E-1200	OAC rule 3745-21-07(G)(2)	See A.I.2.a below.
	OAC rule 3745-31-05(A)(3) PTI 02-13904	See A.I.2.b and A.I.2.c below.
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).

2. **Additional Terms and Conditions**

- a. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day nor more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01. Emissions of organic materials from cleanup with photochemically reactive materials shall be included in the calculation of actual emissions when determining compliance with the 8 pounds per hour and 40 pounds per day limits.
- b. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are not employed, applied, evaporated, or dried, the permittee shall emit no more than 50 (fifty) pounds per hour of organic compounds.
- c. The emissions of organic compounds from emissions units P007 through P015, P018 through P020, and P024 through P036, combined, shall be limited to 75 (seventy five) tons per year.

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II. **Operational Restrictions**

1. None

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

1. The permittee shall keep the following daily records for all materials used in this emissions unit:
 - a. the identification of the chemical compound and its physical state; and
 - b. for any liquid organic materials, whether or not each material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall develop an emission factor for the total amount of organic compounds emitted for each

- final product generated in this emissions unit. The emission factors shall be in units of pounds of organic compounds emitted per pound of final product generated. The permittee shall indicate whether or not each emission factor is based upon the use of any photochemically reactive materials. The permittee's calculation of each emission factor shall be subject to the review and approval of the Ohio EPA Northeast District Office.
3. The permittee shall collect and record the following information for each final product generated in this emissions unit:
 - a. the company identification for each final product generated;
 - b. whether or not any photochemically reactive materials were used to generate each final product;
 - c. the quantity of each final product generated, in pounds;
 - d. the emission factor for each final product generated, in pounds of organic compounds emitted per pound of final product generated;
 - e. the number of days the emissions unit was in operation to generate each final product; and
 - f. the average daily organic compound emission rate, in pounds per day ($c \times d/e$).
 4. The permittee shall collect and record the following information each day for all final products generated in this emissions unit:
 - a. For each day during which any photochemically reactive material was used as a cleanup material and/or for one or more of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from $i = 1$ to $i = n$, of A.III.3.f).
 - b. For each day during which no photochemically reactive material was used as a cleanup material and/or for any of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from $i = 1$ to $i = n$, of A.III.3.f).
 5. The permittee shall collect and record the following information for the cleanup materials employed each day in this emissions unit:
 - a. the company identification for each cleanup material;
 - b. whether or not each cleanup material is a photochemically reactive material;
 - c. the quantity of each cleanup material employed that is a photochemically reactive material, in gallons;
 - d. the OC content of each cleanup material employed that is a photochemically reactive material, in pounds per gallon;
 - e. the quantity of each cleanup material employed that is not a photochemically reactive material, in gallons;
 - f. the OC content of each cleanup material employed that is not a photochemically reactive material, in pounds per gallon;
 - g. the daily emissions of the cleanup materials that are photochemically reactive materials, in pounds per day (the summation, from $i = 1$ to $i = n$ of $c \times d$);
 - h. the daily emissions of the cleanup materials that are not photochemically reactive materials, in pounds per day (the summation, from $i = 1$ to $i = n$ of $e \times f$); and
 - i. the total daily OC emissions from all cleanup materials, in pounds per day ($g + h$).
 6. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the number of hours of operation;
 - b. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per day (A.III.5.g + A.III.4.a);
 - c. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the average hourly emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per hour (A.III.6.b/A.III.6.a);
 - d. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are not photochemically reactive materials, in pounds per day (A.III.5.h);
 - e. for each day during which no photochemically reactive material was used for any of the final products and/or any of the cleanup materials, the total daily emissions from all final products and all cleanup materials, in pounds per day (A.III.5.h + A.III.4.b);
 - f. for each day during which no photochemically reactive material was used for any of the final products and/or any of the cleanup materials, the average hourly emissions from all final products and all cleanup materials, in pounds per hour (A.III.6.e/ A.III.6.a); and
 - g. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions for all final products and all cleanup materials, in pounds per day (A.III.6.b + A.III.6.d).
 7. The permittee shall record annually the OC emissions from this emissions unit and from emissions units P007

through P015, P018 through P020, and P024 through P036, combined. The annual emission (in tons) for this emissions unit shall be calculated by summing the values from A.III.6.e and A.III.6.g for the entire calendar year and then dividing by 2000.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 8 pounds per hour, and the actual average organic compound emission rate for each such day.
 - b. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - c. For the days during which no photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the emissions unit exceeded 50 pounds per hour, and the actual organic compound emission rate for each such day.
2. Each year, the permittee shall submit an annual report, by March 31, for the preceding calendar year. Each annual report shall specify the annual OC emissions for this emissions unit and for emissions units P007 through P015, P018 through P020, and P024 through P036, combined.

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V. Testing Requirements

1. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.
2. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.
3. Emission Limitation: On the days that no photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit no more than 50 (fifty) pounds per hour of organic compounds.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.
4. Emission Limitation: 75 tons OC per year from emissions units P007 through P015, P018 through P020, and P024 through P036, combined.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.
5. Formulation data shall be used to determine the organic compound contents of the materials employed for each final product and each cleanup material.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0243000241 Emissions Unit ID: P030 Issuance type: Title V Draft Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
LUWA wiped/thin film evaporator system, 1.4 square feet, E-1200	None	None

2. Additional Terms and Conditions

1. None

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit (P030) was evaluated based on the actual materials employed and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant potentially emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each of the potential pollutants discharges from P030:

Pollutant: acetone
 TLV (ug/m3): 1188000
 Maximum Hourly Emission Rate (lbs/hr): 3.5
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3)*: 255 (EF45) and 230 (EF76)
 MAGLC (ug/m3): 118800

Pollutant: acetonitrile
 TLV (ug/m3): 67000
 Maximum Hourly Emission Rate (lbs/hr): 1.0
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 71 (EF45) and 64 (EF76)
 MAGLC (ug/m3): 6700

Pollutant: cyclohexane
 TLV (ug/m3): 1030000
 Maximum Hourly Emission Rate (lbs/hr): 2.2
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 158 (EF45) and 143 (EF76)
 MAGLC (ug/m3): 103000

Pollutant: dimethylformamide
 TLV (ug/m3): 30000
 Maximum Hourly Emission Rate (lbs/hr): 0.1
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 6 (EF45) and 5 (EF76)
 MAGLC (ug/m3): 3000

Pollutant: ethyl acetate
 TLV (ug/m3): 1440000
 Maximum Hourly Emission Rate (lbs/hr): 2.1
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 156 (EF45) and 141 (EF76)
 MAGLC (ug/m3): 144000

Pollutant: ethyl alcohol
 TLV (ug/m3): 1880000
 Maximum Hourly Emission Rate (lbs/hr): 0.7
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 52 (EF45) and 47 (EF76)
 MAGLC (ug/m3): 188000

Pollutant: heptane
 TLV (ug/m3): 1640000
 Maximum Hourly Emission Rate (lbs/hr): 1.2
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 87 (EF45) and 78 (EF76)
 MAGLC (ug/m3): 164000

Pollutant: isopropyl acetate

TLV (ug/m3): 1044000

Maximum Hourly Emission Rate (lbs/hr): 1.6

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 117 (EF45) and 106 (EF76)

MAGLC (ug/m3): 104400

Pollutant: isopropyl alcohol

TLV (ug/m3): 983000

Maximum Hourly Emission Rate (lbs/hr): 0.7

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 52 (EF45) and 47 (EF76)

MAGLC (ug/m3): 98300

Pollutant: methyl alcohol

TLV (ug/m3): 262000

Maximum Hourly Emission Rate (lbs/hr): 1.1

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 77 (EF45) and 70 (EF76)

MAGLC (ug/m3): 26200

Pollutant: methylamyl alcohol

TLV (ug/m3): 104000

Maximum Hourly Emission Rate (lbs/hr): 0.1

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4 (EF45) and 3 (EF76)

MAGLC (ug/m3): 10400

Pollutant: methylene chloride

TLV (ug/m3): 174000

Maximum Hourly Emission Rate (lbs/hr): 9.7

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 708 (EF45) and 639 (EF76)

MAGLC (ug/m3): 17400

Pollutant: methyl tert butyl ether

TLV (ug/m3): 144000

Maximum Hourly Emission Rate (lbs/hr): 5.7

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 419 (EF45) and 379 (EF76)

MAGLC (ug/m3): 14400

Pollutant: pyridine

TLV (ug/m3): 16000

Maximum Hourly Emission Rate (lbs/hr): 0.4

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 31 (EF45) and 28 (EF76)

MAGLC (ug/m3): 1600

Pollutant: tetrahydrofuran

TLV (ug/m3): 590000

Maximum Hourly Emission Rate (lbs/hr): 3.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 222 (EF45) and 200 (EF76)

MAGLC (ug/m3): 59000

Pollutant: toluene

TLV (ug/m3): 188000

Maximum Hourly Emission Rate (lbs/hr): 0.7

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 50 (EF45) and 45 (EF76)

MAGLC (ug/m3): 18800

* Emissions unit will discharge through either egress point EF45 or EF76, but not both simultaneously.

Physical changes to or changes in the method of operation of the emissions unit after its installation 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 be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

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

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

- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
- 2. The permittee shall sum the predicted 1-hour maximum ground-level concentrations for each pollutant from emissions units P007 through P015, P018 through P020, and P024 through P036, to demonstrate compliance with the "Air Toxic Policy". This sum shall take into account the actual equipment's operating schedule and equipment utilization. Comparison of the sum to the MAGLC shall be made to demonstrate compliance with the "Air Toxic Policy".

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0243000241 Emissions Unit ID: P031 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
2000 gallon process tank, T-2200	OAC rule 3745-21-07(G)(2) OAC rule 3745-31-05(A)(3) PTI 02-13904	See A.I.2.a below. See A.I.2.b and A.I.2.c below.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).

2. Additional Terms and Conditions

- a. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day nor more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01. Emissions of organic materials from cleanup with photochemically reactive materials shall be included in the calculation of actual emissions when determining compliance with the 8 pounds per hour and 40 pounds per day limits.
- b. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are not employed, applied, evaporated, or dried, the permittee shall emit no more than 50 (fifty) pounds per hour of organic compounds.
- c. The emissions of organic compounds from emissions units P007 through P015, P018 through P020, and P024 through P036, combined, shall be limited to 75 (seventy five) tons per year.

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall keep the following daily records for all materials used in this emissions unit:
 - a. the identification of the chemical compound and its physical state; and
 - b. for any liquid organic materials, whether or not each material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall develop an emission factor for the total amount of organic compounds emitted for each final product generated in this emissions unit. The emission factors shall be in units of pounds of organic compounds emitted per pound of final product generated. The permittee shall indicate whether or not each emission factor is based upon the use of any photochemically reactive materials. The permittee's calculation of each emission factor shall be subject to the review and approval of the Ohio EPA Northeast District Office.
3. The permittee shall collect and record the following information for each final product generated in this emissions unit:
 - a. the company identification for each final product generated;
 - b. whether or not any photochemically reactive materials were used to generate each final product;
 - c. the quantity of each final product generated, in pounds;
 - d. the emission factor for each final product generated, in pounds of organic compounds emitted per pound of final product generated;
 - e. the number of days the emissions unit was in operation to generate each final product; and
 - f. the average daily organic compound emission rate, in pounds per day (c x d)/e.
4. The permittee shall collect and record the following information each day for all final products generated in this emissions unit:
 - a. For each day during which any photochemically reactive material was used as a cleanup material and/or for one or more of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from i = 1 to i = n, of A.III.3.f).
 - b. For each day during which no photochemically reactive material was used as a cleanup material and/or for any of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from i = 1 to i = n, of A.III.3.f).
5. The permittee shall collect and record the following information for the cleanup materials employed each day in this emissions unit:
 - a. the company identification for each cleanup material;
 - b. whether or not each cleanup material is a photochemically reactive material;
 - c. the quantity of each cleanup material employed that is a photochemically reactive material, in gallons;
 - d. the OC content of each cleanup material employed that is a photochemically reactive material, in pounds per gallon;
 - e. the quantity of each cleanup material employed that is not a photochemically reactive material, in gallons;
 - f. the OC content of each cleanup material employed that is not a photochemically reactive material, in pounds per gallon;
 - g. the daily emissions of the cleanup materials that are photochemically reactive materials, in pounds per day (the summation, from i = 1 to i = n of c x d);
 - h. the daily emissions of the cleanup materials that are not photochemically reactive materials, in pounds per day (the summation, from i = 1 to i = n of e x f); and
 - i. the total daily OC emissions from all cleanup materials, in pounds per day (g + h).
6. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the number of hours of operation;
 - b. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are

- photochemically reactive materials and all the final products, in pounds per day (A.III.5.g + A.III.4.a);
- c. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the average hourly emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per hour (A.III.6.b/A.III.6.a);
 - d. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are not photochemically reactive materials, in pounds per day (A.III.5.h);
 - e. for each day during which no photochemically reactive material was used for any of the final products and/or any of the cleanup materials, the total daily emissions from all final products and all cleanup materials, in pounds per day (A.III.5.h + A.III.4.b);
 - f. for each day during which no photochemically reactive material was used for any of the final products and/or any of the cleanup materials, the average hourly emissions from all final products and all cleanup materials, in pounds per hour (A.III.6.e/ A.III.6.a); and
 - g. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions for all final products and all cleanup materials, in pounds per day (A.III.6.b + A.III.6.d).
7. The permittee shall record annually the OC emissions from this emissions unit and from emissions units P007 through P015, P018 through P020, and P024 through P036, combined. The annual emission (in tons) for this emissions unit shall be calculated by summing the values from A.III.6.e and A.III.6.g for the entire calendar year and then dividing by 2000.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 8 pounds per hour, and the actual average organic compound emission rate for each such day.
 - b. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - c. For the days during which no photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the emissions unit exceeded 50 pounds per hour, and the actual organic compound emission rate for each such day.
2. Each year, the permittee shall submit an annual report, by March 31, for the preceding calendar year. Each annual report shall specify the annual OC emissions for this emissions unit and for emissions units P007 through P015, P018 through P020, and P024 through P036, combined.

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V. Testing Requirements

1. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.
2. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.
3. Emission Limitation: On the days that no photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit no more than 50 (fifty) pounds per hour of organic compounds.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.
4. Emission Limitation: 75 tons OC per year from emissions units P007 through P015, P018 through P020, and P024 through P036, combined.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.
5. Formulation data shall be used to determine the organic compound contents of the materials employed for

each final product and each cleanup material.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0243000241 Emissions Unit ID: P031 Issuance type: Title V Draft Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
2000 gallon process tank, T-2200	None	None
2. Additional Terms and Conditions		
1. None		

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II. **Operational Restrictions**

1. None

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

1. The permit to install for this emissions unit (P031) was evaluated based on the actual materials employed and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant potentially emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each of the potential pollutants discharges from P031:

Pollutant: acetic acid
 TLV (ug/m3): 25000
 Maximum Hourly Emission Rate (lbs/hr): 2.1
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3)*: 157 (EF45) and 142 (EF76)
 MAGLC (ug/m3): 2500

Pollutant: acetone
 TLV (ug/m3): 1188000
 Maximum Hourly Emission Rate (lbs/hr): 30.7
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2244 (EF45) and 2026 (EF76)
 MAGLC (ug/m3): 118800

Pollutant: acetonitrile
 TLV (ug/m3): 67000
 Maximum Hourly Emission Rate (lbs/hr): 8.6
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 626 (EF45) and 566 (EF76)
 MAGLC (ug/m3): 6700

Pollutant: cyclohexane

TLV (ug/m3): 1030000
Maximum Hourly Emission Rate (lbs/hr): 19.0
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1393 (EF45) and 1257 (EF76)
MAGLC (ug/m3): 103000

Pollutant: diethyl ether

TLV (ug/m3): 1210000
Maximum Hourly Emission Rate (lbs/hr): 91.2
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 6680 (EF45) and 6030 (EF76)
MAGLC (ug/m3): 121000

Pollutant: dimethylformamide

TLV (ug/m3): 30000
Maximum Hourly Emission Rate (lbs/hr): 0.7
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 50 (EF45) and 45 (EF76)
MAGLC (ug/m3): 3000

Pollutant: ethyl acetate

TLV (ug/m3): 1440000
Maximum Hourly Emission Rate (lbs/hr): 18.8
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1376 (EF45) and 1242 (EF76)
MAGLC (ug/m3): 144000

Pollutant: ethyl alcohol

TLV (ug/m3): 1880000
Maximum Hourly Emission Rate (lbs/hr): 6.3
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 459 (EF45) and 414 (EF76)
MAGLC (ug/m3): 188000

Pollutant: heptane

TLV (ug/m3): 1640000
Maximum Hourly Emission Rate (lbs/hr): 10.4
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 764 (EF45) and 689 (EF76)
MAGLC (ug/m3): 164000

Pollutant: isopropyl acetate

TLV (ug/m3): 1044000
Maximum Hourly Emission Rate (lbs/hr): 14.1
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1033 (EF45) and 933 (EF76)
MAGLC (ug/m3): 104400

Pollutant: isopropyl alcohol

TLV (ug/m3): 983000
Maximum Hourly Emission Rate (lbs/hr): 6.2
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 457 (EF45) and 413 (EF76)
MAGLC (ug/m3): 98300

Pollutant: methyl alcohol

TLV (ug/m3): 262000
Maximum Hourly Emission Rate (lbs/hr): 9.3
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 678 (EF45) and 612 (EF76)
MAGLC (ug/m3): 26200

Pollutant: methylamyl alcohol

TLV (ug/m3): 104000
Maximum Hourly Emission Rate (lbs/hr): 0.4
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 33 (EF45) and 30 (EF76)
MAGLC (ug/m3): 10400

Pollutant: methylene chloride

TLV (ug/m3): 174000
Maximum Hourly Emission Rate (lbs/hr): 45.0
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3295 (EF45) and 2974 (EF76)
MAGLC (ug/m3): 17400

Pollutant: methyl tert butyl ether

TLV (ug/m3): 144000
Maximum Hourly Emission Rate (lbs/hr): 26.1
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1910 (EF45) and 1724 (EF76)
MAGLC (ug/m3): 14400

Pollutant: pyridine

TLV (ug/m3): 16000
Maximum Hourly Emission Rate (lbs/hr): 3.8
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 275 (EF45) and 249 (EF76)
MAGLC (ug/m3): 1600

Pollutant: tetrahydrofuran

TLV (ug/m3): 590000
Maximum Hourly Emission Rate (lbs/hr): 26.7
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1951 (EF45) and 1762 (EF76)
MAGLC (ug/m3): 59000

Pollutant: toluene

TLV (ug/m3): 188000
Maximum Hourly Emission Rate (lbs/hr): 6.0
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 440 (EF45) and 397 (EF76)

MAGLC (ug/m3): 18800

* Emissions unit will discharge through either egress point EF45 or EF76, but not both simultaneously.

Physical changes to or changes in the method of operation of the emissions unit after its installation 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 be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

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

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

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

2. The permittee shall sum the predicted 1-hour maximum ground-level concentrations for each pollutant from emissions units P007 through P015, P018 through P020, and P024 through P036, to demonstrate compliance with the "Air Toxic Policy". This sum shall take into account the actual equipment's operating schedule and equipment utilization. Comparison of the sum to the MAGLC shall be made to demonstrate compliance with the "Air Toxic Policy".

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0243000241 Emissions Unit ID: P032 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
Perforated basket filter, SS, 24 inches, S-3900	OAC rule 3745-21-07(G)(2)	See A.I.2.a below.
	OAC rule 3745-31-05(A)(3) PTI 02-13904	See A.I.2.b and A.I.2.c below.
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).

2. Additional Terms and Conditions

- a. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day nor more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01. Emissions of organic materials from cleanup with photochemically reactive materials shall be included in the calculation of actual emissions when determining compliance with the 8 pounds per hour and 40 pounds per day limits.
- b. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are not employed, applied, evaporated, or dried, the permittee shall emit no more than 50 (fifty) pounds per hour of organic compounds.
- c. The emissions of organic compounds from emissions units P007 through P015, P018 through P020, and P024 through P036, combined, shall be limited to 75 (seventy five) tons per year.

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall keep the following daily records for all materials used in this emissions unit:
 - a. the identification of the chemical compound and its physical state; and
 - b. for any liquid organic materials, whether or not each material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall develop an emission factor for the total amount of organic compounds emitted for each final product generated in this emissions unit. The emission factors shall be in units of pounds of organic compounds emitted per pound of final product generated. The permittee shall indicate whether or not each emission factor is based upon the use of any photochemically reactive materials. The permittee's calculation of each emission factor shall be subject to the review and approval of the Ohio EPA Northeast District Office.
3. The permittee shall collect and record the following information for each final product generated in this emissions unit:
 - a. the company identification for each final product generated;
 - b. whether or not any photochemically reactive materials were used to generate each final product;
 - c. the quantity of each final product generated, in pounds;
 - d. the emission factor for each final product generated, in pounds of organic compounds emitted per pound of final product generated;
 - e. the number of days the emissions unit was in operation to generate each final product; and
 - f. the average daily organic compound emission rate, in pounds per day (c x d)/e.
4. The permittee shall collect and record the following information each day for all final products generated in this emissions unit:
 - a. For each day during which any photochemically reactive material was used as a cleanup material and/or for one or more of the final products, the total average daily emissions from all final products produced

- that day, in pounds per day (the summation, from $i = 1$ to $i = n$, of A.III.3.f).
- b. For each day during which no photochemically reactive material was used as a cleanup material and/or for any of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from $i = 1$ to $i = n$, of A.III.3.f).
5. The permittee shall collect and record the following information for the cleanup materials employed each day in this emissions unit:
 - a. the company identification for each cleanup material;
 - b. whether or not each cleanup material is a photochemically reactive material;
 - c. the quantity of each cleanup material employed that is a photochemically reactive material, in gallons;
 - d. the OC content of each cleanup material employed that is a photochemically reactive material, in pounds per gallon;
 - e. the quantity of each cleanup material employed that is not a photochemically reactive material, in gallons;
 - f. the OC content of each cleanup material employed that is not a photochemically reactive material, in pounds per gallon;
 - g. the daily emissions of the cleanup materials that are photochemically reactive materials, in pounds per day (the summation, from $i = 1$ to $i = n$ of $c \times d$);
 - h. the daily emissions of the cleanup materials that are not photochemically reactive materials, in pounds per day (the summation, from $i = 1$ to $i = n$ of $e \times f$); and
 - i. the total daily OC emissions from all cleanup materials, in pounds per day ($g + h$).
 6. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the number of hours of operation;
 - b. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per day (A.III.5.g + A.III.4.a);
 - c. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the average hourly emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per hour (A.III.6.b/A.III.6.a);
 - d. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are not photochemically reactive materials, in pounds per day (A.III.5.h);
 - e. for each day during which no photochemically reactive material was used for any of the final products and/or any of the cleanup materials, the total daily emissions from all final products and all cleanup materials, in pounds per day (A.III.5.h + A.III.4.b);
 - f. for each day during which no photochemically reactive material was used for any of the final products and/or any of the cleanup materials, the average hourly emissions from all final products and all cleanup materials, in pounds per hour (A.III.6.e/ A.III.6.a); and
 - g. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions for all final products and all cleanup materials, in pounds per day (A.III.6.b + A.III.6.d).
 7. The permittee shall record annually the OC emissions from this emissions unit and from emissions units P007 through P015, P018 through P020, and P024 through P036, combined. The annual emission (in tons) for this emissions unit shall be calculated by summing the values from A.III.6.e and A.III.6.g for the entire calendar year and then dividing by 2000.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 8 pounds per hour, and the actual average organic compound emission rate for each such day.
 - b. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - c. For the days during which no photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the emissions unit exceeded 50 pounds per hour, and the actual organic compound emission rate for each such day.
2. Each year, the permittee shall submit an annual report, by March 31, for the preceding calendar year. Each annual report shall specify the annual OC emissions for this emissions unit and for emissions units P007

through P015, P018 through P020, and P024 through P036, combined.

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V. **Testing Requirements**

1. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.
2. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.
3. Emission Limitation: On the days that no photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit no more than 50 (fifty) pounds per hour of organic compounds.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.
4. Emission Limitation: 75 tons OC per year from emissions units P007 through P015, P018 through P020, and P024 through P036, combined.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.
5. Formulation data shall be used to determine the organic compound contents of the materials employed for each final product and each cleanup material.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0243000241 Emissions Unit ID: P032 Issuance type: Title V Draft Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
Perforated basket filter, SS, 24 inches, S-3900	None	None

2. **Additional Terms and Conditions**

1. None

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0243000241 Emissions Unit ID: P033 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
Pressure filter, SS, 24 inches, S-7000	OAC rule 3745-21-07(G)(2)	See A.I.2.a below.
	OAC rule 3745-31-05(A)(3)	See A.I.2.b and A.I.2.c below.
	PTI 02-13904	

The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).

2. Additional Terms and Conditions

- a. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day nor more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01. Emissions of organic materials from cleanup with photochemically reactive materials shall be included in the calculation of actual emissions when determining compliance with the 8 pounds per hour and 40 pounds per day limits.
- b. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are not employed, applied, evaporated, or dried, the permittee shall emit no more than 50 (fifty) pounds per hour of organic compounds.

- c. The emissions of organic compounds from emissions units P007 through P015, P018 through P020, and P024 through P036, combined, shall be limited to 75 (seventy five) tons per year.

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall keep the following daily records for all materials used in this emissions unit:
 - a. the identification of the chemical compound and its physical state; and
 - b. for any liquid organic materials, whether or not each material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall develop an emission factor for the total amount of organic compounds emitted for each final product generated in this emissions unit. The emission factors shall be in units of pounds of organic compounds emitted per pound of final product generated. The permittee shall indicate whether or not each emission factor is based upon the use of any photochemically reactive materials. The permittee's calculation of each emission factor shall be subject to the review and approval of the Ohio EPA Northeast District Office.
3. The permittee shall collect and record the following information for each final product generated in this emissions unit:
 - a. the company identification for each final product generated;
 - b. whether or not any photochemically reactive materials were used to generate each final product;
 - c. the quantity of each final product generated, in pounds;
 - d. the emission factor for each final product generated, in pounds of organic compounds emitted per pound of final product generated;
 - e. the number of days the emissions unit was in operation to generate each final product; and
 - f. the average daily organic compound emission rate, in pounds per day (c x d)/e.
4. The permittee shall collect and record the following information each day for all final products generated in this emissions unit:
 - a. For each day during which any photochemically reactive material was used as a cleanup material and/or for one or more of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from i = 1 to i = n, of A.III.3.f).
 - b. For each day during which no photochemically reactive material was used as a cleanup material and/or for any of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from i = 1 to i = n, of A.III.3.f).
5. The permittee shall collect and record the following information for the cleanup materials employed each day in this emissions unit:
 - a. the company identification for each cleanup material;
 - b. whether or not each cleanup material is a photochemically reactive material;
 - c. the quantity of each cleanup material employed that is a photochemically reactive material, in gallons;
 - d. the OC content of each cleanup material employed that is a photochemically reactive material, in pounds per gallon;
 - e. the quantity of each cleanup material employed that is not a photochemically reactive material, in gallons;
 - f. the OC content of each cleanup material employed that is not a photochemically reactive material, in pounds per gallon;
 - g. the daily emissions of the cleanup materials that are photochemically reactive materials, in pounds per day (the summation, from i = 1 to i = n of c x d);
 - h. the daily emissions of the cleanup materials that are not photochemically reactive materials, in pounds per day (the summation, from i = 1 to i = n of e x f); and
 - i. the total daily OC emissions from all cleanup materials, in pounds per day (g + h).
6. The permittee shall collect and record the following information each day for this emissions unit:

- a. the number of hours of operation;
 - b. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per day (A.III.5.g + A.III.4.a);
 - c. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the average hourly emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per hour (A.III.6.b/A.III.6.a);
 - d. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are not photochemically reactive materials, in pounds per day (A.III.5.h);
 - e. for each day during which no photochemically reactive material was used for any of the final products and/or any of the cleanup materials, the total daily emissions from all final products and all cleanup materials, in pounds per day (A.III.5.h + A.III.4.b);
 - f. for each day during which no photochemically reactive material was used for any of the final products and/or any of the cleanup materials, the average hourly emissions from all final products and all cleanup materials, in pounds per hour (A.III.6.e/ A.III.6.a); and
 - g. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions for all final products and all cleanup materials, in pounds per day (A.III.6.b + A.III.6.d).
7. The permittee shall record annually the OC emissions from this emissions unit and from emissions units P007 through P015, P018 through P020, and P024 through P036, combined. The annual emission (in tons) for this emissions unit shall be calculated by summing the values from A.III.6.e and A.III.6.g for the entire calendar year and then dividing by 2000.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 8 pounds per hour, and the actual average organic compound emission rate for each such day.
 - b. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - c. For the days during which no photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the emissions unit exceeded 50 pounds per hour, and the actual organic compound emission rate for each such day.
2. Each year, the permittee shall submit an annual report, by March 31, for the preceding calendar year. Each annual report shall specify the annual OC emissions for this emissions unit and for emissions units P007 through P015, P018 through P020, and P024 through P036, combined.

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V. Testing Requirements

1. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.
2. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.
3. Emission Limitation: On the days that no photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit no more than 50 (fifty) pounds per hour of organic compounds.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.
4. Emission Limitation: 75 tons OC per year from emissions units P007 through P015, P018 through P020, and P024 through P036, combined.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.

5. Formulation data shall be used to determine the organic compound contents of the materials employed for each final product and each cleanup material.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0243000241 Emissions Unit ID: P033 Issuance type: Title V Draft Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
2.	Additional Terms and Conditions		
1.	None		

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II. **Operational Restrictions**

1. None

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

1. The permit to install for this emissions unit (P033) was evaluated based on the actual materials employed and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant potentially emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each of the potential pollutants discharges from P033:

Pollutant: acetic acid
 TLV (ug/m3): 25000
 Maximum Hourly Emission Rate (lbs/hr): 0.2
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3)*: 15 (EF45) and 14 (EF76)
 MAGLC (ug/m3): 2500

Pollutant: acetone
 TLV (ug/m3): 1188000
 Maximum Hourly Emission Rate (lbs/hr): 12.8
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 937 (EF45) and 846 (EF76)
 MAGLC (ug/m3): 118800

Pollutant: acetonitrile

TLV (ug/m3): 67000

Maximum Hourly Emission Rate (lbs/hr): 0.8

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 61 (EF45) and 55 (EF76)

MAGLC (ug/m3): 6700

Pollutant: cyclohexane

TLV (ug/m3): 1030000

Maximum Hourly Emission Rate (lbs/hr): 1.9

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 136 (EF45) and 123 (EF76)

MAGLC (ug/m3): 103000

Pollutant: dimethylformamide

TLV (ug/m3): 30000

Maximum Hourly Emission Rate (lbs/hr): 0.1

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 5 (EF45) and 4 (EF76)

MAGLC (ug/m3): 3000

Pollutant: ethyl acetate

TLV (ug/m3): 1440000

Maximum Hourly Emission Rate (lbs/hr): 1.8

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 134 (EF45) and 121 (EF76)

MAGLC (ug/m3): 144000

Pollutant: ethyl alcohol

TLV (ug/m3): 1880000

Maximum Hourly Emission Rate (lbs/hr): 0.6

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 45 (EF45) and 40 (EF76)

MAGLC (ug/m3): 188000

Pollutant: heptane

TLV (ug/m3): 1640000

Maximum Hourly Emission Rate (lbs/hr): 1.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 74 (EF45) and 67 (EF76)

MAGLC (ug/m3): 164000

Pollutant: isopropyl acetate

TLV (ug/m3): 1044000

Maximum Hourly Emission Rate (lbs/hr): 1.4

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 101 (EF45) and 91 (EF76)

MAGLC (ug/m3): 104400

Pollutant: isopropyl alcohol

TLV (ug/m3): 983000

Maximum Hourly Emission Rate (lbs/hr): 0.6

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 45 (EF45) and 40 (EF76)

MAGLC (ug/m3): 98300

Pollutant: methyl alcohol

TLV (ug/m3): 262000

Maximum Hourly Emission Rate (lbs/hr): 0.9

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 66 (EF45) and 60 (EF76)

MAGLC (ug/m3): 26200

Pollutant: methylamyl alcohol

TLV (ug/m3): 104000

Maximum Hourly Emission Rate (lbs/hr): 0.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3 (EF45) and 3 (EF76)

MAGLC (ug/m3): 10400

Pollutant: methylene chloride

TLV (ug/m3): 174000

Maximum Hourly Emission Rate (lbs/hr): 8.3

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 608 (EF45) and 549 (EF76)

MAGLC (ug/m3): 17400

Pollutant: methyl tert butyl ether

TLV (ug/m3): 144000

Maximum Hourly Emission Rate (lbs/hr): 4.9

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 360 (EF45) and 325 (EF76)

MAGLC (ug/m3): 14400

Pollutant: pyridine

TLV (ug/m3): 16000

Maximum Hourly Emission Rate (lbs/hr): 0.4

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 27 (EF45) and 24 (EF76)

MAGLC (ug/m3): 1600

Pollutant: tetrahydrofuran

TLV (ug/m3): 590000

Maximum Hourly Emission Rate (lbs/hr): 2.6

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 190 (EF45) and 172 (EF76)

MAGLC (ug/m3): 59000

Pollutant: toluene

TLV (ug/m3): 188000

Maximum Hourly Emission Rate (lbs/hr): 0.6

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 43 (EF45) and 39 (EF76)

MAGLC (ug/m3): 18800

* Emissions unit will discharge through either egress point EF45 or EF76, but not both simultaneously.

Physical changes to or changes in the method of operation of the emissions unit after its installation 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 be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

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

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

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

2. The permittee shall sum the predicted 1-hour maximum ground-level concentrations for each pollutant from emissions units P007 through P015, P018 through P020, and P024 through P036, to demonstrate compliance with the "Air Toxic Policy". This sum shall take into account the actual equipment's operating schedule and equipment utilization. Comparison of the sum to the MAGLC shall be made to demonstrate compliance with the "Air Toxic Policy".

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0243000241 Emissions Unit ID: P034 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
Pressure filter, GLS, 24 inches, S-7100	OAC rule 3745-21-07(G)(2)	See A.I.2.a below.
	OAC rule 3745-31-05(A)(3)	See A.I.2.b and A.I.2.c below.
	PTI 02-13904	

The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).

2. **Additional Terms and Conditions**

- a. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day nor more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01. Emissions of organic materials from cleanup with photochemically reactive materials shall be included in the calculation of actual emissions when determining compliance with the 8 pounds per hour and 40 pounds per day limits.
- b. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are not employed, applied, evaporated, or dried, the permittee shall emit no more than 50 (fifty) pounds per hour of organic compounds.
- c. The emissions of organic compounds from emissions units P007 through P015, P018 through P020, and P024 through P036, combined, shall be limited to 75 (seventy five) tons per year.

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II. **Operational Restrictions**

1. None

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

1. The permittee shall keep the following daily records for all materials used in this emissions unit:
 - a. the identification of the chemical compound and its physical state; and
 - b. for any liquid organic materials, whether or not each material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall develop an emission factor for the total amount of organic compounds emitted for each final product generated in this emissions unit. The emission factors shall be in units of pounds of organic compounds emitted per pound of final product generated. The permittee shall indicate whether or not each emission factor is based upon the use of any photochemically reactive materials. The permittee's calculation of each emission factor shall be subject to the review and approval of the Ohio EPA Northeast District Office.
3. The permittee shall collect and record the following information for each final product generated in this emissions unit:
 - a. the company identification for each final product generated;
 - b. whether or not any photochemically reactive materials were used to generate each final product;
 - c. the quantity of each final product generated, in pounds;
 - d. the emission factor for each final product generated, in pounds of organic compounds emitted per pound of final product generated;
 - e. the number of days the emissions unit was in operation to generate each final product; and
 - f. the average daily organic compound emission rate, in pounds per day (c x d)/e.
4. The permittee shall collect and record the following information each day for all final products generated in this emissions unit:
 - a. For each day during which any photochemically reactive material was used as a cleanup material and/or for one or more of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from i = 1 to i = n, of A.III.3.f).
 - b. For each day during which no photochemically reactive material was used as a cleanup material and/or for

- any of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from $i = 1$ to $i = n$, of A.III.3.f).
5. The permittee shall collect and record the following information for the cleanup materials employed each day in this emissions unit:
 - a. the company identification for each cleanup material;
 - b. whether or not each cleanup material is a photochemically reactive material;
 - c. the quantity of each cleanup material employed that is a photochemically reactive material, in gallons;
 - d. the OC content of each cleanup material employed that is a photochemically reactive material, in pounds per gallon;
 - e. the quantity of each cleanup material employed that is not a photochemically reactive material, in gallons;
 - f. the OC content of each cleanup material employed that is not a photochemically reactive material, in pounds per gallon;
 - g. the daily emissions of the cleanup materials that are photochemically reactive materials, in pounds per day (the summation, from $i = 1$ to $i = n$ of $c \times d$);
 - h. the daily emissions of the cleanup materials that are not photochemically reactive materials, in pounds per day (the summation, from $i = 1$ to $i = n$ of $e \times f$); and
 - i. the total daily OC emissions from all cleanup materials, in pounds per day ($g + h$).
 6. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the number of hours of operation;
 - b. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per day (A.III.5.g + A.III.4.a);
 - c. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the average hourly emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per hour (A.III.6.b/A.III.6.a);
 - d. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are not photochemically reactive materials, in pounds per day (A.III.5.h);
 - e. for each day during which no photochemically reactive material was used for any of the final products and/or any of the cleanup materials, the total daily emissions from all final products and all cleanup materials, in pounds per day (A.III.5.h + A.III.4.b);
 - f. for each day during which no photochemically reactive material was used for any of the final products and/or any of the cleanup materials, the average hourly emissions from all final products and all cleanup materials, in pounds per hour (A.III.6.e/ A.III.6.a); and
 - g. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions for all final products and all cleanup materials, in pounds per day (A.III.6.b + A.III.6.d).
 7. The permittee shall record annually the OC emissions from this emissions unit and from emissions units P007 through P015, P018 through P020, and P024 through P036, combined. The annual emission (in tons) for this emissions unit shall be calculated by summing the values from A.III.6.e and A.III.6.g for the entire calendar year and then dividing by 2000.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 8 pounds per hour, and the actual average organic compound emission rate for each such day.
 - b. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - c. For the days during which no photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the emissions unit exceeded 50 pounds per hour, and the actual organic compound emission rate for each such day.
2. Each year, the permittee shall submit an annual report, by March 31, for the preceding calendar year. Each annual report shall specify the annual OC emissions for this emissions unit and for emissions units P007 through P015, P018 through P020, and P024 through P036, combined.

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V. **Testing Requirements**

1. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.
2. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.
3. Emission Limitation: On the days that no photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit no more than 50 (fifty) pounds per hour of organic compounds.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.
4. Emission Limitation: 75 tons OC per year from emissions units P007 through P015, P018 through P020, and P024 through P036, combined.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.
5. Formulation data shall be used to determine the organic compound contents of the materials employed for each final product and each cleanup material.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0243000241 Issuance type: Title V Draft Permit

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Facility ID: 0243000241 Emissions Unit ID: P034 Issuance type: Title V Draft Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
Pressure filter, GLS, 24 inches, S-7100	None	None

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit (P034) was evaluated based on the actual materials employed and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant potentially emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each of the potential pollutants discharges from P034:

Pollutant: acetic acid
TLV (ug/m3): 25000
Maximum Hourly Emission Rate (lbs/hr): 0.2
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3)*: 16 (EF45) and 14 (EF76)
MAGLC (ug/m3): 2500

Pollutant: acetone
TLV (ug/m3): 1188000
Maximum Hourly Emission Rate (lbs/hr): 13.2
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 966 (EF45) and 872 (EF76)
MAGLC (ug/m3): 118800

Pollutant: acetonitrile
TLV (ug/m3): 67000
Maximum Hourly Emission Rate (lbs/hr): 0.9
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 63 (EF45) and 56 (EF76)
MAGLC (ug/m3): 6700

Pollutant: cyclohexane
TLV (ug/m3): 1030000
Maximum Hourly Emission Rate (lbs/hr): 1.9
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 139 (EF45) and 126 (EF76)
MAGLC (ug/m3): 103000

Pollutant: dimethylformamide
TLV (ug/m3): 30000
Maximum Hourly Emission Rate (lbs/hr): 0.1
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 5 (EF45) and 4 (EF76)
MAGLC (ug/m3): 3000

Pollutant: ethyl acetate
TLV (ug/m3): 1440000
Maximum Hourly Emission Rate (lbs/hr): 1.9
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 137 (EF45) and 124 (EF76)
MAGLC (ug/m3): 144000

Pollutant: ethyl alcohol
TLV (ug/m3): 1880000
Maximum Hourly Emission Rate (lbs/hr): 0.6
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 46 (EF45) and 41 (EF76)
MAGLC (ug/m3): 188000

Pollutant: heptane
TLV (ug/m3): 1640000
Maximum Hourly Emission Rate (lbs/hr): 1.0
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 76 (EF45) and 69 (EF76)
MAGLC (ug/m3): 164000

Pollutant: isopropyl acetate
TLV (ug/m3): 1044000
Maximum Hourly Emission Rate (lbs/hr): 1.4
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 103 (EF45) and 93 (EF76)
MAGLC (ug/m3): 104400

Pollutant: isopropyl alcohol
TLV (ug/m3): 983000
Maximum Hourly Emission Rate (lbs/hr): 0.6
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 46 (EF45) and 41 (EF76)
MAGLC (ug/m3): 98300

Pollutant: methyl alcohol
TLV (ug/m3): 262000
Maximum Hourly Emission Rate (lbs/hr): 0.9
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 68 (EF45) and 61 (EF76)
MAGLC (ug/m3): 26200

Pollutant: methylamyl alcohol
TLV (ug/m3): 104000
Maximum Hourly Emission Rate (lbs/hr): 0.0
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3 (EF45) and 3 (EF76)
MAGLC (ug/m3): 10400

Pollutant: methylene chloride
 TLV (ug/m3): 174000
 Maximum Hourly Emission Rate (lbs/hr): 8.5
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 622 (EF45) and 562 (EF76)
 MAGLC (ug/m3): 17400

Pollutant: methyl tert butyl ether
 TLV (ug/m3): 144000
 Maximum Hourly Emission Rate (lbs/hr): 5.0
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 369 (EF45) and 333 (EF76)
 MAGLC (ug/m3): 14400

Pollutant: pyridine
 TLV (ug/m3): 16000
 Maximum Hourly Emission Rate (lbs/hr): 0.4
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 27 (EF45) and 25 (EF76)
 MAGLC (ug/m3): 1600

Pollutant: tetrahydrofuran
 TLV (ug/m3): 590000
 Maximum Hourly Emission Rate (lbs/hr): 2.7
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 195 (EF45) and 176 (EF76)
 MAGLC (ug/m3): 59000

Pollutant: toluene
 TLV (ug/m3): 188000
 Maximum Hourly Emission Rate (lbs/hr): 0.6
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 44 (EF45) and 40 (EF76)
 MAGLC (ug/m3): 18800

* Emissions unit will discharge through either egress point EF45 or EF76, but not both simultaneously.

Physical changes to or changes in the method of operation of the emissions unit after its installation 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 be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

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

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

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

2. The permittee shall sum the predicted 1-hour maximum ground-level concentrations for each pollutant from emissions units P007 through P015, P018 through P020, and P024 through P036, to demonstrate compliance with the "Air Toxic Policy". This sum shall take into account the actual equipment's operating schedule and equipment utilization. Comparison of the sum to the MAGLC shall be made to demonstrate compliance with the "Air Toxic Policy".

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IV. Reporting Requirements

1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0243000241 Emissions Unit ID: P035 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
Pressure filter, SS, 24 inches, S-14600	OAC rule 3745-21-07(G)(2) OAC rule 3745-31-05(A)(3) PTI 02-13904	See A.I.2.a below. See A.I.2.b and A.I.2.c below.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).

2. Additional Terms and Conditions

- a. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day nor more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01. Emissions of organic materials from cleanup with photochemically reactive materials shall be included in the calculation of actual emissions when determining compliance with the 8 pounds per hour and 40 pounds per day limits.
- b. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are not employed, applied, evaporated, or dried, the permittee shall emit no more than 50 (fifty) pounds per hour of organic compounds.
- c. The emissions of organic compounds from emissions units P007 through P015, P018 through P020, and P024 through P036, combined, shall be limited to 75 (seventy five) tons per year.

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall keep the following daily records for all materials used in this emissions unit:
 - a. the identification of the chemical compound and its physical state; and
 - b. for any liquid organic materials, whether or not each material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).
- 2. The permittee shall develop an emission factor for the total amount of organic compounds emitted for each final product generated in this emissions unit. The emission factors shall be in units of pounds of organic

- compounds emitted per pound of final product generated. The permittee shall indicate whether or not each emission factor is based upon the use of any photochemically reactive materials. The permittee's calculation of each emission factor shall be subject to the review and approval of the Ohio EPA Northeast District Office.
3. The permittee shall collect and record the following information for each final product generated in this emissions unit:
 - a. the company identification for each final product generated;
 - b. whether or not any photochemically reactive materials were used to generate each final product;
 - c. the quantity of each final product generated, in pounds;
 - d. the emission factor for each final product generated, in pounds of organic compounds emitted per pound of final product generated;
 - e. the number of days the emissions unit was in operation to generate each final product; and
 - f. the average daily organic compound emission rate, in pounds per day (c x d)/e.
 4. The permittee shall collect and record the following information each day for all final products generated in this emissions unit:
 - a. For each day during which any photochemically reactive material was used as a cleanup material and/or for one or more of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from $i = 1$ to $i = n$, of A.III.3.f).
 - b. For each day during which no photochemically reactive material was used as a cleanup material and/or for any of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from $i = 1$ to $i = n$, of A.III.3.f).
 5. The permittee shall collect and record the following information for the cleanup materials employed each day in this emissions unit:
 - a. the company identification for each cleanup material;
 - b. whether or not each cleanup material is a photochemically reactive material;
 - c. the quantity of each cleanup material employed that is a photochemically reactive material, in gallons;
 - d. the OC content of each cleanup material employed that is a photochemically reactive material, in pounds per gallon;
 - e. the quantity of each cleanup material employed that is not a photochemically reactive material, in gallons;
 - f. the OC content of each cleanup material employed that is not a photochemically reactive material, in pounds per gallon;
 - g. the daily emissions of the cleanup materials that are photochemically reactive materials, in pounds per day (the summation, from $i = 1$ to $i = n$ of c x d);
 - h. the daily emissions of the cleanup materials that are not photochemically reactive materials, in pounds per day (the summation, from $i = 1$ to $i = n$ of e x f); and
 - i. the total daily OC emissions from all cleanup materials, in pounds per day (g + h).
 6. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the number of hours of operation;
 - b. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per day (A.III.5.g + A.III.4.a);
 - c. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the average hourly emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per hour (A.III.6.b/A.III.6.a);
 - d. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are not photochemically reactive materials, in pounds per day (A.III.5.h);
 - e. for each day during which no photochemically reactive material was used for any of the final products and/or any of the cleanup materials, the total daily emissions from all final products and all cleanup materials, in pounds per day (A.III.5.h + A.III.4.b);
 - f. for each day during which no photochemically reactive material was used for any of the final products and/or any of the cleanup materials, the average hourly emissions from all final products and all cleanup materials, in pounds per hour (A.III.6.e/ A.III.6.a); and
 - g. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all final products and all cleanup materials, in pounds per day (A.III.6.b + A.III.6.d).
 7. The permittee shall record annually the OC emissions from this emissions unit and from emissions units P007 through P015, P018 through P020, and P024 through P036, combined. The annual emission (in tons) for

this emissions unit shall be calculated by summing the values from A.III.6.e and A.III.6.g for the entire calendar year and then dividing by 2000.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 8 pounds per hour, and the actual average organic compound emission rate for each such day.
 - b. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - c. For the days during which no photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the emissions unit exceeded 50 pounds per hour, and the actual organic compound emission rate for each such day.
2. Each year, the permittee shall submit an annual report, by March 31, for the preceding calendar year. Each annual report shall specify the annual OC emissions for this emissions unit and for emissions units P007 through P015, P018 through P020, and P024 through P036, combined.

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V. Testing Requirements

1. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.
2. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.
3. Emission Limitation: On the days that no photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit no more than 50 (fifty) pounds per hour of organic compounds.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.
4. Emission Limitation: 75 tons OC per year from emissions units P007 through P015, P018 through P020, and P024 through P036, combined.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.
5. Formulation data shall be used to determine the organic compound contents of the materials employed for each final product and each cleanup material.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0243000241 Emissions Unit ID: P035 Issuance type: Title V Draft Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under

state law only.

1. None.

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>
Pressure filter, SS, 24 inches, S-14600	None	None
2. Additional Terms and Conditions		
1. None		

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit (P035) was evaluated based on the actual materials employed and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant potentially emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each of the potential pollutants discharges from P035:

Pollutant: acetic acid
 TLV (ug/m3): 25000
 Maximum Hourly Emission Rate (lbs/hr): 0.2
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3)*: 15 (EF45) and 14 (EF76)
 MAGLC (ug/m3): 2500

Pollutant: acetone
 TLV (ug/m3): 1188000
 Maximum Hourly Emission Rate (lbs/hr): 12.8
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 937 (EF45) and 846 (EF76)
 MAGLC (ug/m3): 118800

Pollutant: acetonitrile
 TLV (ug/m3): 67000
 Maximum Hourly Emission Rate (lbs/hr): 0.8
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 61 (EF45) and 55 (EF76)
 MAGLC (ug/m3): 6700

Pollutant: cyclohexane
 TLV (ug/m3): 1030000
 Maximum Hourly Emission Rate (lbs/hr): 1.9
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 136 (EF45) and 123 (EF76)
 MAGLC (ug/m3): 103000

Pollutant: dimethylformamide
 TLV (ug/m3): 30000
 Maximum Hourly Emission Rate (lbs/hr): 0.1
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 5 (EF45) and 4 (EF76)
 MAGLC (ug/m3): 3000

Pollutant: ethyl acetate
 TLV (ug/m3): 1440000
 Maximum Hourly Emission Rate (lbs/hr): 1.8
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 134 (EF45) and 121 (EF76)
 MAGLC (ug/m3): 144000

Pollutant: ethyl alcohol
 TLV (ug/m3): 1880000
 Maximum Hourly Emission Rate (lbs/hr): 0.6
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 45 (EF45) and 40 (EF76)
 MAGLC (ug/m3): 188000

Pollutant: heptane

TLV (ug/m3): 1640000

Maximum Hourly Emission Rate (lbs/hr): 1.0
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 74 (EF45) and 67 (EF76)
 MAGLC (ug/m3): 164000
 Pollutant: isopropyl acetate
 TLV (ug/m3): 1044000
 Maximum Hourly Emission Rate (lbs/hr): 1.4
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 101 (EF45) and 91 (EF76)
 MAGLC (ug/m3): 104400

Pollutant: isopropyl alcohol
 TLV (ug/m3): 983000
 Maximum Hourly Emission Rate (lbs/hr): 0.6
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 45 (EF45) and 40 (EF76)
 MAGLC (ug/m3): 98300

Pollutant: methyl alcohol
 TLV (ug/m3): 262000
 Maximum Hourly Emission Rate (lbs/hr): 0.9
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 66 (EF45) and 60 (EF76)
 MAGLC (ug/m3): 26200

Pollutant: methylamyl alcohol
 TLV (ug/m3): 104000
 Maximum Hourly Emission Rate (lbs/hr): 0.0
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3 (EF45) and 3 (EF76)
 MAGLC (ug/m3): 10400

Pollutant: methylene chloride
 TLV (ug/m3): 174000
 Maximum Hourly Emission Rate (lbs/hr): 8.3
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 608 (EF45) and 549 (EF76)
 MAGLC (ug/m3): 17400

Pollutant: methyl tert butyl ether
 TLV (ug/m3): 144000
 Maximum Hourly Emission Rate (lbs/hr): 4.9
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 360 (EF45) and 325 (EF76)
 MAGLC (ug/m3): 14400

Pollutant: pyridine
 TLV (ug/m3): 16000
 Maximum Hourly Emission Rate (lbs/hr): 0.4
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 27 (EF45) and 24 (EF76)
 MAGLC (ug/m3): 1600
 Pollutant: tetrahydrofuran
 TLV (ug/m3): 590000
 Maximum Hourly Emission Rate (lbs/hr): 2.6
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 190 (EF45) and 172 (EF76)
 MAGLC (ug/m3): 59000

Pollutant: toluene
 TLV (ug/m3): 188000
 Maximum Hourly Emission Rate (lbs/hr): 0.6
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 43 (EF45) and 39 (EF76)
 MAGLC (ug/m3): 18800

* Emissions unit will discharge through either egress point EF45 or EF76, but not both simultaneously.

Physical changes to or changes in the method of operation of the emissions unit after its installation 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 be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in

stack/exhaust parameters, etc.);

- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
2. The permittee shall sum the predicted 1-hour maximum ground-level concentrations for each pollutant from emissions units P007 through P015, P018 through P020, and P024 through P036, to demonstrate compliance with the "Air Toxic Policy". This sum shall take into account the actual equipment's operating schedule and equipment utilization. Comparison of the sum to the MAGLC shall be made to demonstrate compliance with the "Air Toxic Policy".

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IV. Reporting Requirements

- 1. None

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0243000241 Emissions Unit ID: P036 Issuance type: Title V Draft Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
Four cavity bag filter, S-9400	OAC rule 3745-21-07(G)(2)	See A.I.2.a below.
	OAC rule 3745-31-05(A)(3) PTI 02-13904	See A.I.2.b and A.I.2.c below.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).

2. Additional Terms and Conditions

- a. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day nor more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01. Emissions of organic materials from cleanup with photochemically reactive materials shall be included in the calculation of actual emissions when determining compliance with the 8 pounds per hour and 40 pounds per day limits.
- b. On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are not employed, applied, evaporated, or dried, the permittee shall emit no more than 50 (fifty) pounds per hour of organic compounds.

- c. The emissions of organic compounds from emissions units P007 through P015, P018 through P020, and P024 through P036, combined, shall be limited to 75 (seventy five) tons per year.

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall keep the following daily records for all materials used in this emissions unit:
- the identification of the chemical compound and its physical state; and
 - for any liquid organic materials, whether or not each material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall develop an emission factor for the total amount of organic compounds emitted for each final product generated in this emissions unit. The emission factors shall be in units of pounds of organic compounds emitted per pound of final product generated. The permittee shall indicate whether or not each emission factor is based upon the use of any photochemically reactive materials. The permittee's calculation of each emission factor shall be subject to the review and approval of the Ohio EPA Northeast District Office.
3. The permittee shall collect and record the following information for each final product generated in this emissions unit:
- the company identification for each final product generated;
 - whether or not any photochemically reactive materials were used to generate each final product;
 - the quantity of each final product generated, in pounds;
 - the emission factor for each final product generated, in pounds of organic compounds emitted per pound of final product generated;
 - the number of days the emissions unit was in operation to generate each final product; and
 - the average daily organic compound emission rate, in pounds per day (c x d)/e.
4. The permittee shall collect and record the following information each day for all final products generated in this emissions unit:
- For each day during which any photochemically reactive material was used as a cleanup material and/or for one or more of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from $i = 1$ to $i = n$, of A.III.3.f).
 - For each day during which no photochemically reactive material was used as a cleanup material and/or for any of the final products, the total average daily emissions from all final products produced that day, in pounds per day (the summation, from $i = 1$ to $i = n$, of A.III.3.f).
5. The permittee shall collect and record the following information for the cleanup materials employed each day in this emissions unit:
- the company identification for each cleanup material;
 - whether or not each cleanup material is a photochemically reactive material;
 - the quantity of each cleanup material employed that is a photochemically reactive material, in gallons;
 - the OC content of each cleanup material employed that is a photochemically reactive material, in pounds per gallon;
 - the quantity of each cleanup material employed that is not a photochemically reactive material, in gallons;
 - the OC content of each cleanup material employed that is not a photochemically reactive material, in pounds per gallon;
 - the daily emissions of the cleanup materials that are photochemically reactive materials, in pounds per day (the summation, from $i = 1$ to $i = n$ of c x d);
 - the daily emissions of the cleanup materials that are not photochemically reactive materials, in pounds per day (the summation, from $i = 1$ to $i = n$ of e x f); and
 - the total daily OC emissions from all cleanup materials, in pounds per day (g + h).
6. The permittee shall collect and record the following information each day for this emissions unit:

- a. the number of hours of operation;
 - b. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per day (A.III.5.g + A.III.4.a);
 - c. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the average hourly emissions from all the cleanup materials that are photochemically reactive materials and all the final products, in pounds per hour (A.III.6.b/A.III.6.a);
 - d. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions from all the cleanup materials that are not photochemically reactive materials, in pounds per day (A.III.5.h);
 - e. for each day during which no photochemically reactive material was used for any of the final products and/or any of the cleanup materials, the total daily emissions from all final products and all cleanup materials, in pounds per day (A.III.5.h + A.III.4.b);
 - f. for each day during which no photochemically reactive material was used for any of the final products and/or any of the cleanup materials, the average hourly emissions from all final products and all cleanup materials, in pounds per hour (A.III.6.e/ A.III.6.a); and
 - g. for each day during which any photochemically reactive material was used for one or more of the final products and/or as a cleanup material, the total daily emissions for all final products and all cleanup materials, in pounds per day (A.III.6.b + A.III.6.d).
7. The permittee shall record annually the OC emissions from this emissions unit and from emissions units P007 through P015, P018 through P020, and P024 through P036, combined. The annual emission (in tons) for this emissions unit shall be calculated by summing the values from A.III.6.e and A.III.6.g for the entire calendar year and then dividing by 2000.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 8 pounds per hour, and the actual average organic compound emission rate for each such day.
 - b. For the days during which a photochemically reactive material was employed, an identification of each day during which the average organic compound emissions from the emissions unit exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - c. For the days during which no photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the emissions unit exceeded 50 pounds per hour, and the actual organic compound emission rate for each such day.
2. Each year, the permittee shall submit an annual report, by March 31, for the preceding calendar year. Each annual report shall specify the annual OC emissions for this emissions unit and for emissions units P007 through P015, P018 through P020, and P024 through P036, combined.

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V. Testing Requirements

1. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 40 (forty) pounds per day of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.
2. Emission Limitation: On the days that photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit not more than 8 (eight) pounds per hour of organic compounds, as defined in OAC rule 3745-21-01.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.
3. Emission Limitation: On the days that no photochemically reactive materials, as defined in OAC rule 3745-21-01, are employed, applied, evaporated, or dried, the permittee shall emit no more than 50 (fifty) pounds per hour of organic compounds.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions. If required by the Ohio EPA, compliance shall be demonstrated by emissions testing using U.S. EPA reference Methods 25, 25A, or 18.
4. Emission Limitation: 75 tons OC per year from emissions units P007 through P015, P018 through P020, and P024 through P036, combined.

Applicable Compliance Method: Compliance shall be demonstrated by the record keeping required in Section A.III of these terms and conditions.

5. Formulation data shall be used to determine the organic compound contents of the materials employed for each final product and each cleanup material.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0243000241 Emissions Unit ID: P036 Issuance type: Title V Draft Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
2.	Additional Terms and Conditions		
1.	Four cavity bag filter, S-9400	None	None
1.	None		

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II. **Operational Restrictions**

1. None

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

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None