



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

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

**RE: FINAL PERMIT TO INSTALL
CUYAHOGA COUNTY
Application No: 13-04262**

CERTIFIED MAIL

	TOXIC REVIEW
	PSD
	SYNTHETIC MINOR
	CEMS
	MACT
40 CFR 60 subpart RR	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

DATE: 5/4/2004

Ritrama Duramark
Bruce Syme
341 Eddy Rd
Cleveland, OH 44108-1601

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA

CLAA



**Permit To Install
Terms and Conditions**

**Issue Date: 5/4/2004
Effective Date: 5/4/2004**

FINAL PERMIT TO INSTALL 13-04262

Application Number: 13-04262
APS Premise Number: 1318007355
Permit Fee: **\$200**
Name of Facility: Ritrama Duramark
Person to Contact: Bruce Syme
Address: 341 Eddy Rd
Cleveland, OH 44108-1601

Location of proposed air contaminant source(s) [emissions unit(s)]:
**341 Eddy Rd
Cleveland, Ohio**

Description of proposed emissions unit(s):
Cast vinyl coating line -- K004.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may

be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions

and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	15.22
* single HAP	9.9
* combined HAPs	24.9

*** total facility combined HAPs for emissions units K003 and K004**

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
K004 - Vinyl cast coating line (coating line 1) controlled by a thermal oxidizer	OAC rule 3745-31-05 (A)(3)	Volatile Organic Compound (VOC) emissions from coating shall not exceed 6.1 lbs/hr and 15.22 tpy including cleanup material.
Terms in this permit supercede those identified in PTI 13-3112 issued 12/5/96.	OAC rule 3745- 21-09 (F)	See A.2.b
	OAC rule 3745-21-09(B)(6)	See A.2.c
MODIFIED		The capture and control requirements specified by this rule are less stringent than the capture and control requirements established pursuant to OAC rule 3745-31-05 (A)(3)
	OAC rule 3745-35-07 (B) Synthetic Minor to avoid Title V	See terms A.2.a, A.2.b, B.1. and B.2
	40 CFR 60 subpart RR	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The total allowable usage and emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 tons/year for any single HAP and 24.9 tons/year for any combination of HAPs facility wide (i.e., K003 and K004). VOC emissions are restricted to 15.22 tons per year for K004. Compliance with the above limitations shall be based on a rolling, 12- month summation.

- 2.b** The permittee shall provide a capture and control efficiency (i.e., overall VOC emission reduction) of no less than 97.2% and shall achieve a control efficiency of not less than 97.3% by weight to control emissions generated by the application of the coatings.
- 2.c** In lieu of complying with the pounds of VOC per gallon of solids limitation contained in OAC rule 3745-21-09 (F), the permittee shall comply with the capture and control requirements established as BAT in A.2.b. above.

B. Operational Restrictions

1. The maximum annual operating hours for this emissions unit shall not exceed 4992, based upon a rolling, 12-month summation of the operating hours. This operating hours restriction will limit the VOC emissions to 15.22 tons per rolling, 12-month period for K004. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the operating hours level specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Operating Hours</u>
1	416
1 - 2	832
1 - 3	1248
1 - 4	1664
1 - 5	2080
1 - 6	2496
1 - 7	2912
1 - 8	3328
1 - 9	3744
1 - 10	4160
1 - 11	4576
1 - 12	4992

2. Maintain and operate a regenerative thermal oxidizer (RTO) as follows:
- The permittee shall employ a capture system which shall capture not less than 99.9%, by weight, of all VOC emissions from the emission unit.
 - The permittee shall employ a control system which shall destroy not less than 97.3%, by weight, of the VOC emission captured.
3. The average combustion temperature within the thermal incinerator, for any 3 - hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the line:
 - a. the name and identification number of each coating as applied;
 - b. the VOC content of each coating and cleanup material, in pounds per gallon, as applied;
 - c. the number of hours of operation;
 - d. the amount, in gallons, of each coating and cleanup employed;
 - e. the daily VOC emission rate determined by summing (bxd) for each coating and cleanup employed and then multiplying by (1 - the capture & control efficiency) from the most recent stack test which demonstrated compliance;
 - f. the average hourly emission rate in pounds per hour (e/c);
 - g. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating , as applied;
 - h. the total combined Hazardous Air Pollutant (HAP) content for each coating in pounds of combined HAPs per gallon of coating , as applied (sum all the individual HAP contents from g);
 - i. the name and identification of each cleanup material employed;
 - j. the individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon of cleanup material, as applied;
 - k. the total combined HAP content of each cleanup material in pounds of individual HAP per gallon of cleanup material, as applied; and
2. The permittee shall maintain monthly records of the total individual HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period. For each HAP, the sum of C.1.d times C.1.g for each coating multiplied by (1 - the capture and control efficiency) from the most recent performance test which demonstrated compliance plus the sum of C.1.j times C.1.d for each cleanup material, multiplied by (1-the capture and control efficiency).
3. The permittee shall maintain monthly records of the total combined Hazardous Air Pollutant emissions from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling , 12-month period. The combined HAP emissions shall be determined by the sum of C.1.d times C.1.h for each coating multiplied by (1 - the capture and control efficiency) from the most recent performance test which demonstrated compliance plus the sum of C.1.k times C.1.d.for each cleanup material, multiplied by (1- capture & control).

4. The permittee shall maintain monthly records of the rolling, 12-month summation of VOC emissions determined by summing the daily emissions for coatings and cleanup from C.1.e above.
5. In accordance with 40 CFR 60.443(b), the permittee shall calculate and record for each calendar month the required overall VOC emission reduction as specified in 40 CFR 60.443(b).
6. In accordance with 40 CFR 60.443(d), the permittee shall determine and record calendar monthly compliance with the overall VOC reduction specified in A.2.b above by comparing the monthly required overall VOC emission reduction specified in 40 CFR 60.443(b) to the overall VOC emission reduction demonstrated in the most recent performance test which demonstrated compliance with the limits in A.2.b.. If the monthly required overall VOC emission reduction is less than or equal to the overall VOC reduction of the most recent performance test, the emissions unit is in compliance with the overall VOC reduction from A.2.b..
7. The permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) combustion temperature within the thermal oxidizer when the emission unit is in operation. Units shall be in degrees Fahrenheit. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modification deemed necessary by the permittee. The monitoring device shall have an accuracy of the greater of ± 0.75 percent of the temperature being measured expressed in degrees celsius or ± 2.5 degrees celsius.
8. The permittee shall collect and record the following information each day for the control equipment when the emissions unit is in operation:
 - a. A log of operating time for the capture (collection) system, control device, monitoring equipment and the associated emission unit; and
 - b. The average temperature of the exhaust gases from the thermal incinerator during each of the eight 3-hour blocks of the time during the day.
9. The permittee shall maintain monthly records of the following information:
 - a. The operating hours for each month.
 - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative operating hours for each calendar month. (i.e. rolling, 12 month summation of the operating hours).

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative operating hours for each month.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports to the Cleveland Division of Air Quality (CDAQ) of exceedances of the overall VOC emission reduction specified in A.2.b determined for each calendar month. Exceedances shall be determined in accordance with C.6 above.
2. The permittee shall submit quarterly deviation (excursion) reports to CDAQ of the following records:
 - a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emission limit.
 - b. All 3- hour blocks of time when the emission s unit was in operation during which the average temperature within the thermal oxidizer does not comply with the temperature limitation specified above.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous quarters.

3. The permittee shall submit deviation (excursion) reports to CDAQ of any monthly record showing any deviation from the following:
 - a. The total individual HAP emissions limitation for each HAP from all coatings and cleanup materials employed, in pounds or tons per rolling, 12 - month period. This is the combined total HAP for all emissions units at this facility (K003 and K004)
 - b. The total combined HAP emissions limitation from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12 - month period. This is the combined total HAPs for all emissions unit at this facility (K003 and K004).
 - c. Exceedances of the rolling, 12 - month summation of the operating hours limitation and, for the first 12 calender months of operation after the issuance of this permit, all exceedances of the maximum allowable cumulative hours limitations. This is for emissions unit K004 only.

These reports shall include a description of the deviation , as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted within 30 days after the deviation occurs.

E. Testing Requirements

1. Compliance with the emission limitation(s) in section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
Individual HAPs emissions shall not exceed 9.9 tpy based upon a rolling 12 -month summation, and combination HAPs emission shall not exceed 24.9 tpy based upon a rolling,

12 month summation. The HAP limitations are combined for all emissions units at this facility (K003 and K004).

Applicable Compliance Method:

Compliance with the emissions limitations shall be determined pursuant to the record keeping requirements.

- b. Emission Limitation:
6.1 lbs/hr and 15.22 tpy VOC, based upon a rolling, 12 - month summation, for coating and cleanup application.

Applicable Compliance Method

Compliance shall be demonstrated by the record keeping requirements contained in section C of this permit.

- c. Emission Limitation:
The permittee shall provide a capture and control efficiency (i.e., overall VOC emission reduction) of no less than 97.2% and shall achieve a control efficiency of not less than 97.3% by weight to control emissions generated by the application of the coatings.

Applicable Compliance Method:

Compliance shall be determined on a calendar monthly basis in accordance with 40 CFR 60.443(d) and the initial performance test requirements specified in 40 CFR 60.444 and 60.446.

- 2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements.
 - a. The emission testing shall be conducted within 6 months of the effective date of this permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the capture and destruction efficiency limitation for VOC emissions and the allowable hourly VOC mass rate of emissions. The emission testing shall be conducted as specified in 40 CFR 60.444 and 60.446.
 - c. Method 25 or 25A of 40 CFR Part 60, Appendix A, shall be employed to demonstrate compliance with the allowable mass emission rate and the destruction efficiency. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Cleveland DAQ will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.

- d. The emission tests shall be conducted while the emissions unit is operating at or near its maximum operating capacity, unless otherwise specified or approved by Cleveland DAQ.
- e. The destruction efficiency (i.e., the percent reduction in mass emissions between the inlet and the outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 and U.S.EPA Methods 25 or 25A or 40 CFR Part 60, Appendix A. Method 24A or 24 shall be used to determine VOC contents of the coatings. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of the interfering gases; and
- f. In accordance with Engineering Guide #56, the results of the performance test shall be converted to pounds of VOC per hour by multiplying the reported pounds of organic carbon per hour (from Method 25 or 25A) by a ratio of 1.2 pounds of organic material per pound of carbon.

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

Personnel from the Cleveland DAQ shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emission unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and /or the performance of the control equipment.

A comprehensive written report on the results of the emissions tests shall be signed by the person or person responsible for the tests and submitted to the Cleveland DAQ within 30 days following completion of the tests.

F. Miscellaneous Requirements

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