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Facility Name: **MACTAC (Morgan Adhesives Company)**

Application Number: **16-1789**

Date: **August 12, 1998**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCE(S)

The proposed source(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 are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Ohio 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

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approval constitutes a violation of Ohio Administrative Code (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 prove to be inadequate or cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 15 days of the effective date of this permit to install.

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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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.

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PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be made at least 90 days prior to start-up of the source.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for 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.

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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **MACTAC (MORGAN ADHESIVE COMPANY)** located in **Summit** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
K014 (Mod)	Modification of coating Line "L" - Emulsion/hot melt paper coating line	Compliance with Additional Special Terms and Conditions. Compliance with Ohio EPA "Air Toxics Policy."	3745-31-05 3745-21-09 (F) 40 CFR 60 Subpart RR	54.0 pounds/hour VOC 35.0 TPY OC 2.9 pounds VOC per gallon of coating 0.20 Kg VOC per Kg of coating solid

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
VOC	35.0

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RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Akron Air Pollution Control, 146 South High Street, Room 904, Akron, OH 44308.**

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Akron Air Pollution Control, 146 South High Street, Room 904, Akron, OH 44308.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the

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shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Operational Restrictions

1. The emissions of VOC from this emissions unit shall not exceed 35.0 tons per year, based upon a rolling, 12 month summation of the monthly emissions.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Emissions of VOC (Tons)</u>
1	3.0
1-2	6.0
1-3	12.0
1-4	15.0
1-5	18.0
1-6	21.0
1-7	24.0
1-8	27.0
1-9	30.0
1-10	33.0
1-11	35.0
1-12	35.0

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After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for VOC shall be based upon a rolling, 12-month summation of the monthly emissions.

B. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the coating operation:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the VOC content of each coating and cleanup material, in pounds per gallon and kg VOC per kg of coating solids;
 - d. the VOC emission rate for all coatings and cleanup materials, in pounds per month;
 - e. the total number of hours the emissions unit was in operation; and,
 - f. the average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

C. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels.

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2. The permittee shall submit deviation (excursion) reports which includes an identification of each period during which the average hourly VOC emissions exceeded 54.0 pounds per hour, and the actual average hourly VOC emissions for each such period.
3. The permittee shall notify the Director (the Akron Air Pollution Control) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the Akron Air Pollution Control) within 30 days following the end of the calendar month.
4. 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 Akron Air Pollution Control; and,
 - 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 Akron Air Pollution Control 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).

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D. Testing Requirements

1. Compliance with the emission limitations in Permit to Install 16-1789 shall be determined in accordance with the following methods:

- a. Emission Limitation

- 2.9 pounds VOC per gallon of coating, excluding water and exempt solvents

- Applicable Compliance Method

- The permittee shall demonstrate compliance with the above limit based upon the recordkeeping requirements of section B.1 of these Additional Special Terms and Conditions.

- U.S. EPA Methods 24 or 24A shall be used to determine the VOC content for all coatings employed. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative statements for Method 24 or 24A.

- b. Emission Limitation

- 0.20 kg VOC/kg of coating solids applied

- Applicable Compliance Method

- The permittee shall maintain a calendar month record of all coatings used and their VOC content. The permittee shall calculate a weighted average of the mass of solvent used per mass of coating solids applied for a one calendar month period according to the following procedures:

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- i. determine the weight fraction of organics and the weight fraction of solids for each coating applied by using Reference Method 24 or by formulation data; and,
- ii. compute the weighted average by the following equation:

$$G = (\text{summation } W_o * M_c) / (\text{summation } W_s * M_c)$$

Where:

G = the calculated weighted average mass (kg) of VOC per mass (kg) of coating solids applied each calendar month

W_o = the weight fraction of organics applied of each coating applied during a calendar month

W_s = the weight fraction of solids applied of each coating applied during a calendar month

M_c = the total mass (kg) of each coating applied during the calendar month as determined from facility records.

- c. Emission Limitation

54.0 pounds/hour VOC

35.0 TPY VOC

Applicable Compliance Method

The permittee shall demonstrate compliance with the above limit based upon the recordkeeping requirements of Section B.1. of these Additional Special Terms and Conditions.

E. Miscellaneous Requirements

1. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application

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for PTI number 16-1789. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the VOC emission limitation(s) specified in this permit was established in accordance with the Ohio EPA's "Air Toxics Policy" and is based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the Screen3 model and a comparison of the predicted 1 hour maximum ground-level concentration to the MAGLC. The following summarizes the results of the modeling for each pollutant:

Pollutant: vinyl acetate

TLV (mg/m3): 35

Maximum Hourly Emission Rate (pounds/hour): 54

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 440.1

Maximum Acceptable Ground-Level Concentration (MAGLC)(ug/m3): 833.3

Pollutant: ethyl acrylate

TLV (mg/m3): 20

Maximum Hourly Emission Rate (pounds/hour): 54

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 440.1

Maximum Acceptable Ground-Level Concentration (MAGLC)(ug/m3): 476

2. Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the Akron Air Pollution Control are required, including the possible issuance of modifications to PTI number 16-1789 and the operating permit:
 - a. any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent

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version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;

- b. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;
- c. any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01;
- d. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)]; and,
- e. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" (HAPS) as defined in OAC rule 3745-77-01(V).