

**Rusell Products Co., Inc.**  
**ADDITIONAL TERMS AND CONDITIONS**

**A. Emission Limitations and Operational Restrictions**

1. The permittee shall comply with the following emissions limitations and operational restrictions which derived from the applicable Ohio Administrative Code Rules or the BAT determination for these emissions units.

a. The permittee shall not emit more than 4.4 pounds per hour of organic compounds from either R001 or R002.

b. The permittee shall not emit more than 0.551 pound per hour of particulate matter from either R001 or R002.

c. The daily volume weighted average VOC content for all coatings employed shall not exceed 4.8 pounds per gallon, as employed excluding water and exempt solvents.

d. The permittee shall not emit more than 8.25 tons per year of organic compounds nor more than 2.4 tons per year of particulate matter from either R001 or R002.

e. Visible emissions from R001 and R002 shall not exceed 10% opacity as a six minute average.

f. The permittee shall operate and maintain a fabric filter in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

**B. Monitoring and/or Record Keeping 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 (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied.

c. The daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B) (9) of OAC rule 3745-21-10 for  $C_{VOC,2}$ .

d. The number of hours the emissions unit was in operation.

e. The average hourly organic compound emission rate for all coatings and clean-up materials employed, in pounds per hour (average).

**C. Reporting Requirements**

a. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

b. The permittee shall submit deviation (excursion) reports which include an identification of each day during which the average hourly total organic compound emissions exceeded 2.5 pounds per hour, and the actual average hourly organic compound emissions for each such day.

**D. Testing Requirements**

a. Compliance with the emission limitation(s) in PTI #16-1725 of these terms and conditions shall be determined in accordance with the following method(s):

i. Emission Limitation:

4.4 lbs/hr VOC  
8.25 ton per year per emissions unit.

Applicable Compliance Method:

Daily records shall be maintained of the VOC content of each coating and cleanup material employed, the daily usage of each coating and cleanup material employed, and the calculated daily VOC emission rate for all coatings and cleanup materials employed. Formulation data or USEPA Method 24 shall be used to determine the VOC content of each coating and cleanup material.

ii. Emission Limitation:

4.8 lbs VOC per gallon of coating.

Applicable Compliance Method:

Daily records shall be maintained of the VOC content of each coating employed, and the calculated daily volume-weighted average VOC content of all

coatings, as applied. Formulation data or USEPA Method 24 shall be used to determine the VOC content of each coating.

iii. Emission Limitation:

0.551 lb/hr particulate matter

Applicable Compliance Method:

Multiply the maximum hourly coating usage rate, in gallons per hour, by the STAPPA derived particulate emission factor of 0.206 pound per gallon.

iv. Emission Limitation:

10% opacity as a 6-minute average

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1).

**E. Miscellaneous Requirements**

a. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI number 16-1725. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the toluene and acetone emission limitation(s) specified in this permit was (were) established in accordance with the Ohio EPA's "Air Toxics Policy" and is (are) 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 Screen 3 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: Toluene**

TLV (ug/m3): 188  
Maximum Hourly Emission Rate (lbs/hr): 4.96  
Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 195.35  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 4,476

**Pollutant: Acetone**

TLV (ug/m3): 1,780  
Maximum Hourly Emission Rate (lbs/hr): 5.32  
Predicted 1 Hour Maximum Ground-Level Concentration at the  
Fenceline (ug/m3): 894.0  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):  
28,285

Pollutant: Methyl Ethyl Ketone

TLV (ug/m3): 590  
Maximum Hourly Emission Rate (lbs/hr): 2.07  
Predicted 1 Hour Maximum Ground-Level Concentration at the  
Fence line (ug/m3): 346.9  
Maximum Acceptable Ground-Level Concentration (MAGLC)  
(ug/m3): 14,047

Pollutant: Xylene

TLV (ug/m3): 434  
Maximum Hourly Emission Rate (lbs/hr): 2.49  
Predicted 1 Hour Maximum Ground-Level Concentration at the  
Fence line (ug/m3): 419  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):  
10,333

b. Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the appropriate Ohio EPA District Office or local air agency are required, including the possible issuance of modifications to PTI number 16-1725 and the operating permit:

- c. 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 version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table.
- d. 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.
- e. A reduction in the TLV by the ACGIH for any of the coatings and cleanup materials that, at the maximum hourly

emission rate specified in the above table, would result in an exceedance of the new MAGLC.

- f. 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.
- g. 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)].
- h. 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).