

Ms. Joanna M. Caley  
Manager-Environmental Services  
ICI Paints North America  
16651 Sprague Road  
Strongsville, Ohio 44136

RE: 02 43 15 0032  
Title V

Dear Joanna:

I am writing to you to try to respond to some of the issues that arose in our meeting on May 22, 1997.

Question #1: If a non-significant source is installed, after the Title V permit is granted, what is required to be done?

I have attached Engineering Guide #63 and a slide from our seminar that discusses this issue. Basically, if the source is non-insignificant source as defined by using the definition of insignificant activities in OAC 3745-77-01(U), then the change is not an "off permit" change and a Title V modification as described in item #3 of the engineering guide is required.

Question #2: Would a permit be required if one of the components of emission unit P013 was moved into the baghouse system that services P014?

Since emissions for P013 would go down, that would be an administrative change in "the activity description" of the Title V permit and probably would be classified as an "off permit change". A letter indicating this information will suffice and the change may be incorporated into the permit upon reopening at renewal.

On the other hand, if the factor on which the allowable for P014 is based, that is the process weight rate increases and therefore the allowable for that emission unit increases, then the installation of the new mixer is a modification and a permit to install is required along with a Title V modification if the emission unit is non-insignificant.

If the move is made of the mixer from P013 and connected to the baghouse for P014, and the allowable could not be met, then a permit to install would be required for the move and a new baghouse would probably follow.

Question #3: How will compliance with the 20% opacity limit in the Title V permit be demonstrated?

From another draft Title V permit comes the following Applicable Compliance Method: "Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03 (B)(1) using the methods and procedures specified in USEPA Reference Method 9". No onsite opacity reader will be required unless opacity is often and/or continuously out of compliance. The frequency of opacity reading

will be established in the Title V permit.

Question #4: How will compliance with the 9.32 lb per hour limit be demonstrated?

According to Engineering Guide #65, which I have attached, monitoring required for an emission unit with uncontrolled particulate actual emissions >25tpy is parametric monitoring namely a manometer or something similar. Note that ranges of proper control in inches of water or Hg must be established.

Further, some formula as we discussed incorporating a valid control efficiency for the dust collector must be established.

For example:  $E = \text{maximum solid charge rate to the mixer (in pounds per hour)} \times 2\% \times (1 - CE)$ .  
 $E = \text{particulate matter emissions rate (lbs/hr)}$

$CE = \text{over all control efficiency of the control device (capture x removal efficiency)}$ .

An acceptable method of determining compliance will be established by the Title V permit and stack testing may be required.

Finally, the permit to install application which you submitted was in process as we spoke and I have now received it.

Please call with any concerns.

Sincerely

Nancy meli