



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

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

RE: DRAFT PERMIT TO INSTALL

LAKE COUNTY

Application No: 02-22255

Fac ID: 0243081155

CERTIFIED MAIL

	TOXIC REVIEW
	PSD
	SYNTHETIC MINOR
	CEMS
HHHHH	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

DATE: 11/7/2006

Henkel Consumer Adhesives, Inc.
Larry Lepard
7405 Production Dr
Mentor, OH 44060

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$3750** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

LAKE COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 02-22255 FOR AN AIR CONTAMINANT SOURCE FOR
Henkel Consumer Adhesives, Inc.**

On 11/7/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Henkel Consumer Adhesives, Inc.**, located at **7405 Production Dr, Mentor, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 02-22255:

3,000 gallon mixer and 4,000 gallon holding tank.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Dennis Bush, Ohio EPA, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087 [(330)425-9171]



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 02-22255

Application Number: 02-22255
Facility ID: 0243081155
Permit Fee: **To be entered upon final issuance**
Name of Facility: Henkel Consumer Adhesives, Inc.
Person to Contact: Larry Lepard
Address: 7405 Production Dr
Mentor, OH 44060

Location of proposed air contaminant source(s) [emissions unit(s)]:
**7405 Production Dr
Mentor, Ohio**

Description of proposed emissions unit(s):
3,000 gallon mixer and 4,000 gallon holding tank.

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. State and Federally Enforceable Permit-To-Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. 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.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written

reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - iv. If this permit is for an emissions unit located at a Title V facility, then each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

2. 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, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. 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 or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. 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

Henkel Consumer Adhesives, Inc.

Facility ID: 0243081155

PTI Application: 02-22255

Issued: To be entered upon final issuance

permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

- ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit-To-Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 source(s) covered by this permit.

11. 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.

12. 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.

13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

B. State Only Enforceable Permit-To-Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit 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 of state-only enforceable 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 state-only required 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 (i.e., postmarked) quarterly, 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. 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.

4. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit 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.

5. Construction of New Sources(s)

This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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.

6. 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.

7. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) 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.

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

Henkel Consumer Adhesives, Inc.

Facility ID: 0243081155

PTI Application: 02-22255

Issued: To be entered upon final issuance

C. 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	97.2
VOC (VOC are a subset of OC emissions.)	39.3
PE/PM10	3.1

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

1. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Coating Manufacturing as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart HHHHH. The compliance date for this rule is December 11, 2006. If equipment is added to an existing source after December 11, 2003, the permittee must comply with the requirements for existing sources in Subpart HHHHH upon startup of the added equipment.
2. The final rules found in 40 CFR Part 63, Subpart HHHHH establish emission limits and work practice standards and compliance requirements for miscellaneous coating manufacturing, wastewater and conveyance systems, transfer operations, storage tanks, and ancillary equipment associated with coating manufacturing. The following adhesive/sealants mixer systems and associated storage tanks are subject to this subpart: P001, P002, P003, P005, P011, P012, P014, P015, P017, T001, T002, T013, T014, T015, T016, T017, Z002, Z003, Z004, Z005, Z006, Z007, Z008, Z009, Z010, Z011, Z012, Z013, Z014, Z015, Z016, Z017, Z018, Z019, Z020, Z021, Z022, Z023, Z040, Z041 and Z042, including chemical transfer and loading to and from the tanks and the mixer systems.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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.

Operations, Property, and/or Equipment - (P019) - Adhesives and Sealants 3,000 gallon Mixer Tank No. 14 (MI-14).

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The BAT determination includes an enclosed mixer tank, use of nitrogen blanketing, and an 85% control efficient, by weight, OC condenser for emissions control.</p> <p>OC emissions shall not exceed 15.0 lbs per hour and 65.7 tons per year and VOC emissions shall not exceed 7.7 lbs per hour and 33.8 tons per year.</p> <p>(VOC emissions are a subset of the OC emissions.)</p> <p>The PE BAT determination include the use of a fabric filter baghouse for PE/PM10 emissions control which can achieve an outlet emissions rate of no greater than 0.03 grain per dscf of exhaust gases.</p> <p>PE emissions shall not exceed 0.7 lb per hour and 3.1 tons per year.</p> <p>Visible particulate emissions from the stack serving this emissions unit shall not exceed 10% opacity, as a six-minute average.</p>
40 CFR Part 63, Subpart HHHHH	See A.I.2.a below.

2. Additional Terms and Conditions

- 2.a The permittee shall comply with the emission limits and work practice standards, as well as other requirements established in 40 CFR Part 63, Subpart HHHHH, upon startup of the emissions unit.

II. Operational Restrictions

1. The average temperature of the exhaust gases from the condenser, for any eight 3-hour blocks of time during the day, shall not be more than 106 degrees Fahrenheit, which is the temperature calculated to maintain a minimum of 85% control efficiency, based on the equations and procedures in 40 CFR Part 63, Section 63.1257(d)(2) and (3). This demonstration shall also serve to demonstrate compliance with the operating limits required in 40 CFR Part 63, Section 63.8005(e) and (f).

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the condenser when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor and recorder shall be guaranteed by the manufacturer to be plus or minus 1 percent of the temperature being measured or plus or minus 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the requirements of 40 CFR Part 63, Section 63.8005(a).
2. The permittee shall collect and record the following information for each day:
 - a. The average temperature of the exhaust gases from the condenser during each of the eight 3-hour blocks of time during the day.
 - b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
 - c. For the temperature monitor, records of each calibration, maintenance performed and monitoring system malfunction per 40 CFR Part 63, Section 63.8080(d). This condition shall become effective upon startup of the emissions unit.
3. The permittee shall use a flow indicator to subtract periods of no flow from the condenser temperature averages in accordance with 40 CFR Part 63, Section 63.8005(g). This condition shall become effective upon startup of the emissions unit.
4. The permittee shall implement an initial and annual inspection of the closed vent system in accordance with 40 CFR Part 63, Section 63.983. This condition shall become effective upon startup of the emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all 3-hour periods of operation during which the average temperature of exhaust gases from the condenser (when there was flow through the condenser) was above the average temperature used in the condenser design evaluation, in accordance with 40 CFR Part 63, Section 63.1257(d).

2. All deviation (excursion) reports shall be submitted in accordance with section A.1.c of the General Terms and Conditions.
3. The permittee shall submit quarterly reports that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
4. The permittee shall submit all of the notifications in 40 CFR Part 63, Sections 63.6(h)(4) and (5), 63.7 (b) and (c), 63.8 (e), (f)(4) and (6), and 63.9 (b) through (h) that apply and by the dates as specified by rule.

V. Testing Requirements

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

15.0 lbs per hour of OC emissions and 7.7 lbs per hour of VOC emissions

Applicable Compliance Method:

Compliance shall be determined in accordance with the test methods and procedures in section A.V.2 of these terms and conditions.
 - 1.b Emission Limitation:

85% overall control efficiency of OC emissions

Applicable Compliance Method:

Compliance shall be determined in accordance with the test methods and procedures in section A.V.2 of these terms and conditions.
 - 1.c Emission Limitations:

65.7 tons per year of OC emissions and 33.8 tons per year of VOC emissions.

Applicable Compliance Method:

The tons per year emission limitations were developed by multiplying the pounds per hour emission limitations by the maximum operating schedule of 8,760 hours per year, and then dividing by 2,000 pounds per ton. Therefore, provided compliance is shown with the hourly emission limitations, compliance shall also be shown with the annual emission limitations.
 - 1.d Emission Limitation:

PE emissions shall not exceed 0.7 lb per hour

Applicable Compliance Method:

Compliance shall be determined by multiplying the BAT grain loading limit of 0.03 gr/dscf by the design exhaust flow rate of 2,600 acfm, and by 60 minutes/hour, and then dividing by the conversion factor of 7,000 gr/lb.

1.e Emission Limitation:

PE emissions shall not exceed 3.1 tons per year

Applicable Compliance Method:

The tons per year emission limitation was developed by multiplying the pounds per hour emission limitation by the maximum operating schedule of 8,760 hours per year, and then dividing by 2,000 pounds per ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance shall also be shown with the annual emission limitation.

2. The permittee shall conduct a condenser design evaluation in accordance with the equations and procedures in 40 CFR Part 63, Section 63.1257(d) in lieu of emissions testing for this emissions unit.

- a. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the procedures specified in 40 CFR Part 63, Section 63.1257(d)(2) and (3).
- b. The condenser design evaluation shall be conducted while the emissions unit is operating at or near maximum capacity, unless otherwise specified or approved by the Ohio EPA, Northeast District Office.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. 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.

Operations, Property, and/or Equipment - (P019) - Adhesives and Sealants 3,000 gallon Mixer Tank No. 14 (MI-14).

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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.

Operations, Property, and/or Equipment - (P020) - Adhesives and sealants 4,000 gallon holding/storage tank no. 60 (TK-61).

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The BAT determination includes a holding/storage tank, with an 85% control efficient, by weight, OC condenser for emissions control. OC emissions shall not exceed 10.5 tons per year from emissions unit P020 and VOC emissions shall not exceed 5.5 tons per year from emissions units P020, P021 and P022, combined. (VOC emissions are a subset of the OC emissions.)
40 CFR Part 63, Subpart HHHHH	See A.I.2.a below.

2. Additional Terms and Conditions

- 2.a The permittee shall comply with the emission limits and work practice standards, as well as other requirements established in 40 CFR Part 63, Subpart HHHHH, upon startup of the emissions unit.

II. Operational Restrictions

1. The average temperature of the exhaust gases from the condenser, for any eight 3-hour blocks of time during the day, shall not be more than 106 degrees Fahrenheit, which is the temperature calculated to maintain a minimum of 85% control efficiency, based on the equations and procedures in 40 CFR Part 63, Section 63.1257(d)(2) and (3). This demonstration shall also serve to demonstrate compliance with the operating limits required in 40 CFR Part 63, Section 63.8005(e) and (f).

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the

condenser when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor and recorder shall be guaranteed by the manufacturer to be plus or minus 1 percent of the temperature being measured or plus or minus 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the requirements of 40 CFR Part 63, Section 63.8005(a).

- 2 . The permittee shall collect and record the following information for each day:
 - a. The average temperature of the exhaust gases from the condenser during each of the eight 3-hour blocks of time during the day.
 - b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
 - c. For the temperature monitor, records of each calibration, maintenance performed and monitoring system malfunction per 40 CFR Part 63, Section 63.8080(d). This condition shall become effective upon startup of the emissions unit.
- 3 . The permittee shall use a flow indicator to subtract periods of no flow from the condenser temperature averages in accordance with 40 CFR Part 63, Section 63.8005(g). This condition shall become effective upon startup of the emissions unit.
- 4 . The permittee shall implement an initial and annual inspection of the closed vent system in accordance with 40 CFR Part 63, Section 63.983. This condition shall become effective upon startup of the emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all 3-hour periods of operation during which the average temperature of exhaust gases from the condenser (when there was flow through the condenser) was above the average temperature used in the condenser design evaluation, in accordance with 40 CFR Part 63, Section 63.1257(d).
2. All deviation (excursion) reports shall be submitted in accordance with section A.1.c of the General Terms and Conditions.
3. The permittee shall submit quarterly reports that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
4. The permittee shall submit all of the notifications in 40 CFR Part 63, Sections 63.6(h)(4) and (5), 63.7 (b) and (c), 63.8 (e), (f)(4) and (6), and 63.9 (b) through (h) that apply and by the dates as specified by rule.

V. Testing Requirements

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

85% overall control efficiency of OC emissions

Applicable Compliance Method:

Compliance shall be determined in accordance with the test methods and procedures in section A.V.2 of these terms and conditions.
 - 1.b Emission Limitation:

10.5 tons per year of OC emissions

Applicable Compliance Method:

The tons per year emission limitation was developed by multiplying the maximum controlled VOC potential to emit of 2.4 lbs per hour by the maximum operating schedule of 8,760 hours per year, and then dividing by 2,000 pounds per ton. Therefore, provided compliance is shown with the 85% overall control efficiency requirement, compliance shall also be shown with the annual emission limitation.
 - 1.c Emission Limitation:

5.5 tons per year of VOC emissions from P020, P021 and P022, combined.

Applicable Compliance Method:

The tons per year emission limitation was developed by multiplying the maximum controlled OC potential to emit of 1.2 lbs per hour by the maximum operating schedule of 8,760 hours per year, and then dividing by 2,000 pounds per ton. Therefore, provided compliance is shown with the 85% overall control efficiency requirement, compliance shall also be shown with the annual emission limitation.
2. The permittee shall conduct a condenser design evaluation in accordance with the equations and procedures in 40 CFR Part 63, Section 63.1257(d) in lieu of emissions testing for this emissions unit.
 - a. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the procedures specified in 40 CFR Part 63, Section 63.1257(d)(2) and (3).

Henkel Consumer Adhesives, Inc.

PTI Application: 02-22255

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Facility ID: 0243081155

Emissions Unit ID: P020

- b. The condenser design evaluation shall be conducted while the emissions unit is operating at or near maximum capacity, unless otherwise specified or approved by the Ohio EPA, Northeast District Office.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. 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.

Operations, Property, and/or Equipment - (P020) - Adhesives and sealants 4,000 gallon holding/storage tank no. 60 (TK-61).

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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.

Operations, Property, and/or Equipment - (P021) - Adhseives and sealants 4,000 gallon holding/storage tank no. 61 (TK-62).

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The BAT determination includes a holding/storage tank, with an 85% control efficient, by weight, OC condenser for emissions control. OC emissions shall not exceed 10.5 tons per year from emissions unit P021 and VOC emissions shall not exceed 5.5 tons per year from emissions units P020, P021 and P022, combined. (VOC emissions are a subset of the OC emissions.)
40 CFR Part 63, Subpart HHHHH	See A.I.2.a below.

2. Additional Terms and Conditions

- 2.a The permittee shall comply with the emission limits and work practice standards, as well as other requirements established in 40 CFR Part 63, Subpart HHHHH, upon startup of the emissions unit.

II. Operational Restrictions

1. The average temperature of the exhaust gases from the condenser, for any eight 3-hour blocks of time during the day, shall not be more than 106 degrees Fahrenheit, which is the temperature calculated to maintain a minimum of 85% control efficiency, based on the equations and procedures in 40 CFR Part 63, Section 63.1257(d)(2) and (3). This demonstration shall also serve to demonstrate compliance with the operating limits required in 40 CFR Part 63, Section 63.8005(e) and (f).

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the

condenser when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor and recorder shall be guaranteed by the manufacturer to be plus or minus 1 percent of the temperature being measured or plus or minus 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the requirements of 40 CFR Part 63, Section 63.8005(a).

- 2 . The permittee shall collect and record the following information for each day:
 - a. The average temperature of the exhaust gases from the condenser during each of the eight 3-hour blocks of time during the day.
 - b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
 - c. For the temperature monitor, records of each calibration, maintenance performed and monitoring system malfunction per 40 CFR Part 63, Section 63.8080(d). This condition shall become effective upon startup of the emissions unit.
- 3 . The permittee shall use a flow indicator to subtract periods of no flow from the condenser temperature averages in accordance with 40 CFR Part 63, Section 63.8005(g). This condition shall become effective upon startup of the emissions unit.
- 4 . The permittee shall implement an initial and annual inspection of the closed vent system in accordance with 40 CFR Part 63, Section 63.983. This condition shall become effective upon startup of the emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all 3-hour periods of operation during which the average temperature of exhaust gases from the condenser (when there was flow through the condenser) was above the average temperature used in the condenser design evaluation, in accordance with 40 CFR Part 63, Section 63.1257(d).
2. All deviation (excursion) reports shall be submitted in accordance with section A.1.c of the General Terms and Conditions.
3. The permittee shall submit quarterly reports that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
4. The permittee shall submit all of the notifications in 40 CFR Part 63, Sections 63.6(h)(4) and (5), 63.7 (b) and (c), 63.8 (e), (f)(4) and (6), and 63.9 (b) through (h) that apply and by the dates as specified by rule.

V. Testing Requirements

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

85% overall control efficiency of OC emissions

Applicable Compliance Method:

Compliance shall be determined in accordance with the test methods and procedures in section A.V.2 of these terms and conditions.
 - 1.b Emission Limitation:

10.5 tons per year of OC emissions

Applicable Compliance Method:

The tons per year emission limitation was developed by multiplying the maximum controlled OC potential to emit of 2.4 lbs per hour by the maximum operating schedule of 8,760 hours per year, and then dividing by 2,000 pounds per ton. Therefore, provided compliance is shown with the 85% overall control efficiency requirement, compliance shall also be shown with the annual emission limitation.
 - 1.c Emission Limitation:

5.5 tons per year of VOC emissions from P020, P021 and P022, combined.

Applicable Compliance Method:

The tons per year emission limitation was developed by multiplying the maximum controlled VOC potential to emit of 1.2 lbs per hour by the maximum operating schedule of 8,760 hours per year, and then dividing by 2,000 pounds per ton. Therefore, provided compliance is shown with the 85% overall control efficiency requirement, compliance shall also be shown with the annual emission limitation.
2. The permittee shall conduct a condenser design evaluation in accordance with the equations and procedures in 40 CFR Part 63, Section 63.1257(d) in lieu of emissions testing for this emissions unit.
 - a. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the procedures specified in 40 CFR Part 63, Section 63.1257(d)(2) and (3).

Henkel Consumer Adhesives, Inc.

PTI Application: 02-22255

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Emissions Unit ID: P021

- b. The condenser design evaluation shall be conducted while the emissions unit is operating at or near maximum capacity, unless otherwise specified or approved by the Ohio EPA, Northeast District Office.

VI. Miscellaneous Requirements

None

Henkel Consumer Adhesives, Inc.
PTI Application: 02-22255
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Facility ID: 0243081155
Emissions Unit ID: P021

B. State Only Enforceable Section

I. 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.

Operations, Property, and/or Equipment - (P021) - Adhseives and sealants 4,000 gallon holding/storage tank no. 61 (TK-62).

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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.

Operations, Property, and/or Equipment - (P022) - Adhesives and sealants 4,000 gallon holding/storage tank no. 62 (TK-63).

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The BAT determination includes a holding/storage tank, with an 85% control efficient, by weight, OC condenser for emissions control.</p> <p>OC emissions shall not exceed 10.5 tons per year from emissions unit P022 and VOC emissions shall not exceed 5.5 tons per year from emissions units P020, P021 and P022, combined.</p> <p>(VOC emissions are a subset of the OC emissions.)</p>
40 CFR Part 63, Subpart HHHHH	See A.I.2.a below.

2. Additional Terms and Conditions

- 2.a The permittee shall comply with the emission limits and work practice standards, as well as other requirements established in 40 CFR Part 63, Subpart HHHHH, upon startup of the emissions unit.

II. Operational Restrictions

1. The average temperature of the exhaust gases from the condenser, for any eight 3-hour blocks of time during the day, shall not be more than 106 degrees Fahrenheit, which is the temperature calculated to maintain a minimum of 85% control efficiency, based on the equations and procedures in 40 CFR Part 63, Section 63.1257(d)(2) and (3). This demonstration shall also serve to demonstrate compliance with the operating limits required in 40 CFR Part 63, Section 63.8005(e) and (f).

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the condenser when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor and recorder shall be guaranteed by the manufacturer to be plus or minus 1 percent of the temperature being measured or plus or minus 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the requirements of 40 CFR Part 63, Section 63.8005(a).
2. The permittee shall collect and record the following information for each day:
 - a. The average temperature of the exhaust gases from the condenser during each of the eight 3-hour blocks of time during the day.
 - b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
 - c. For the temperature monitor, records of each calibration, maintenance performed and monitoring system malfunction per 40 CFR Part 63, Section 63.8080(d). This condition shall become effective upon startup of the emissions unit.
3. The permittee shall use a flow indicator to subtract periods of no flow from the condenser temperature averages in accordance with 40 CFR Part 63, Section 63.8005(g). This condition shall become effective upon startup of the emissions unit.
4. The permittee shall implement an initial and annual inspection of the closed vent system in accordance with 40 CFR Part 63, Section 63.983. This condition shall become effective upon startup of the emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all 3-hour periods of operation during which the average temperature of exhaust gases from the condenser (when there was flow through the condenser) was above the average temperature used in the condenser design evaluation, in accordance with 40 CFR Part 63, Section 63.1257(d).
2. All deviation (excursion) reports shall be submitted in accordance with section A.1.c of the General Terms and Conditions.
3. The permittee shall submit quarterly reports that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

4. The permittee shall submit all of the notifications in 40 CFR Part 63, Sections 63.6(h)(4) and (5), 63.7 (b) and (c), 63.8 (e), (f)(4) and (6), and 63.9 (b) through (h) that apply and by the dates as specified by rule.

V. Testing Requirements

1. Compliance with the allowable emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:

85% overall control efficiency of OC emissions

Applicable Compliance Method:

Compliance shall be determined in accordance with the test methods and procedures in section A.V.2 of these terms and conditions.

- 1.b Emission Limitation:

10.5 tons per year of OC emissions

Applicable Compliance Method:

The tons per year emission limitation was developed by multiplying the maximum controlled OC potential to emit of 2.4 lbs per hour by the maximum operating schedule of 8,760 hours per year, and then dividing by 2,000 pounds per ton. Therefore, provided compliance is shown with the 85% overall control efficiency requirement, compliance shall also be shown with the annual emission limitation.

- 1.c Emission Limitation:

5.5 tons per year of VOC emissions from P020, P021 and P022, combined.

Applicable Compliance Method:

The tons per year emission limitation was developed by multiplying the maximum controlled VOC potential to emit of 1.2 lbs per hour by the maximum operating schedule of 8,760 hours per year, and then dividing by 2,000 pounds per ton. Therefore, provided compliance is shown with the 85% overall control efficiency requirement, compliance shall also be shown with the annual emission limitation.

2. The permittee shall conduct a condenser design evaluation in accordance with the equations and procedures in 40 CFR Part 63, Section 63.1257(d) in lieu of emissions testing for this emissions unit.

Henkel Consumer Adhesives, Inc.

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Emissions Unit ID: P022

- a. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the procedures specified in 40 CFR Part 63, Section 63.1257(d)(2) and (3).
- b. The condenser design evaluation shall be conducted while the emissions unit is operating at or near maximum capacity, unless otherwise specified or approved by the Ohio EPA, Northeast District Office.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. 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.

Operations, Property, and/or Equipment - (P022) - Adhesives and sealants 4,000 gallon holding/storage tank no. 62 (TK-63).

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None