



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
SHELBY COUNTY
Application No: 05-12092**

CERTIFIED MAIL

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

DATE: 7/25/2002

Thermoseal Inc
Robert Leighty
2350 Campbell Rd
Sidney, OH 453659501

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
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA

SWDO



**Permit To Install
Terms and Conditions**

**Issue Date: 7/25/2002
Effective Date: 7/25/2002**

FINAL PERMIT TO INSTALL 05-12092

Application Number: 05-12092

APS Premise Number: 0575010161

Permit Fee: **\$400**

Name of Facility: Thermoseal Inc

Person to Contact: Robert Leighty

Address: 2350 Campbell Rd
Sidney, OH 453659501

Location of proposed air contaminant source(s) [emissions unit(s)]:

**2350 Campbell Rd
Sidney, Ohio**

Description of proposed emissions unit(s):

Planetary mixing system.

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 Record keeping 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 record keeping 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 record keeping 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 quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.10 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, record keeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., 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. 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.

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 reissuance, or modification, or for denial of a permit renewal application.
- 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, reopened, 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, reopening 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 Permit To Install fees within 30 days after the issuance of this Permit To Install.

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 of 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, the State, and citizens 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 To Install 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 thirty (30) 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.

B. State Only Enforceable 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 Related to Monitoring and Record keeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping 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 record keeping 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. 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. 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.

5. 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.

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

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.

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)

Thermoseal Inc

PTI Application: 05-12092

Issued: 7/25/2002

Facility ID: 0575010161

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.

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>
VOC	0.12
PE	1.86

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

None

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P020 - Planetary mixing system	OAC rule 3745-31-05(A)(3)	1.94 lbs particulate emissions(PE)/hr and 1.86 tons PE/yr 0.26 lb volatile organic compounds (VOC)/hr and 0.12 ton VOC/yr - the combined emissions from the mixing and mobile cleaning operation See A.I.2.a and b.
	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)(2)	The control requirements specified by this rule are less stringent than the control requirements established pursuant to OAC rule 3745-31-05(A) (3).

2. Additional Terms and Conditions

- 2.a The VOC emissions (from this emissions unit (P020) and for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017 and P018, combined) shall not exceed 58.3 tons per rolling 30-day period and 180 tons per rolling 365-day period.
- 2.b The emissions unit shall be equipped with a solvent capture and recovery system that is capable of reducing the overall VOC emissions by at least 90.6%, by weight, based on a 30-day rolling period.

In order to assure compliance, the permittee shall maintain records that demonstrate compliance with the maintenance and monitoring standards as established in the 1999 mass balance protocol agreement between the Ohio Environmental Protection Agency and the permittee.

II. Operational Restrictions

1. The VOC content of the gasket mash produced by this emissions unit shall not exceed 45%, by weight, per batch.

III. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain daily records that list the following information:
 - a. The company identification of the materials being mixed in each batch.
 - b. The amount, in pounds, of the materials being mixed in each batch.
 - c. The VOC content, in percent by weight, of the materials being mixed.
2. The permittee shall collect and record the following information each day from this emissions unit , P020, and from emissions units P001,P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017 and P018, combined in accordance with the established requirements of the 1999 mass balance protocol agreements between the Ohio EPA and the permittee:
 - a. The rolling, 30-day summation of the calculated organic compound emissions, in tons.
 - b. The rolling, 365-day summation of the calculated organic compound emissions, in tons.
 - c. The rolling, 30-day average of the calculated overall capture and control efficiency of the solvents recovery system for the organic compound emissions.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. All exceedances of the rolling, 365-day VOC emission limitation of 180 tons.
 - b. All exceedances of the rolling, 30-day VOC emission limitation of 58.3 tons.
 - c. All records showing that the restriction on the rolling, 30-day average overall capture and control efficiency of the solvent recovery system was below the required 90.6%, by weight, for VOCs.
 - d. All exceedances of the VOC content limitation of 45%, by weight.

2. The permittee shall submit annual reports that summarize the actual annual VOC emissions for this emissions unit, P020, and from emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017 and P018 for the previous calendar year. The reports shall be submitted by January 31 of each year. The CAA, Title V fee emission report required to be submitted annually by April 15 for the facility will also satisfy the emission reporting requirement of this condition.
3. Deviation reports shall be submitted in accordance with reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

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):

1. Emission Limitation:

1.94 lbs PE/hr

Applicable Compliance Method:

To determine the actual worst case emissions rate for PE, the following equation may be used:

$$\text{AER} = (\text{MASPH}) \times \text{UPE} = 1.94 \text{ lbs PE/hr}$$

where,

AER = allowable emission rate (1.94 lbs PE/hr)

MASPH = maximum amount of material per batch per hour (2,092 lbs/batch/hr)

UPE = uncontrolled PE [assume 9.25×10^{-4} lbs/lb of rubber]*

* Reference: Maximum value from draft AP-42 Section 4.12, Table 4.12-4 Internal Mixing and Milling Emission Factors for manufacture of Rubber Products.

2. Emission Limitation:

1.86 tons PE/yr

Applicable Compliance Method:

To determine the actual worst case emissions rate for PE, the following equation may be used:

$$\text{AAER} = (\text{MASPY}) \times \text{UPE} = 1.86 \text{ tons PE/yr}$$

where,

AAER = allowable annual emission rate (1.86 tons PE/yr)

MASPY = maximum amount of material per year (2008 tons/yr) [This is based on the Maximum Annual Production which is assumed to be 8 batches per day, 5 days per week and 48 weeks per year; therefore, no further record keeping is required.]

UPE = uncontrolled PE [assume 9.25×10^{-4} lbs/lb of rubber]*

* Reference: Maximum value from draft AP-42 Section 4.12, Table 4.12-4 Internal Mixing and Milling Emission Factors for manufacture of Rubber Products.

3. Emission Limitation:

0.26 lb VOC/hr

Applicable Compliance Method:

To determine the actual worst case emissions rate for VOC from the mixing and mobile cleaning operation, the following equation should be used:

$$AER = (MASPH) \times UVOC \times CE + (HSU) \times (CVOC) \times (EF) = 0.26 \text{ lb VOC/hr}$$

where,

AER = allowable emission rate (0.26 lb VOC/hr)

MASPH = maximum amount of material per batch per hour (2092 lbs/batch/hr)

UVOC = uncontrolled VOC [assume 4.44×10^{-4} lbs VOC/lb of rubber]*

HSU = Hourly Solvent Usage (2.53 gallons/hr.)

CVOC = VOC content of the cleaning solvent (7.2 lbs VOC/gal.)

EF = 10% x CE

where:

CE = control efficiency (1 - 0.906)

* Reference: Maximum value from draft AP-42 Section 4.12, Table 4.12-4 Internal Mixing and Milling Emission Factors for manufacture of Rubber Products.

4. Emission Limitation:

0.12 ton of VOC/yr

Applicable Compliance Method:

To determine the actual worst case emissions rate for VOC from the mixing and mobile cleaning operation, the following equation should be used:

$$AAER = [(MASPY \times 2000) \times UVOC \times CE + (ASU) \times (CVOC) \times (EF)] \text{ CONV} = 0.12 \text{ ton of VOC /yr}$$

where,

AAER = allowable annual emission rate (0.12 ton of VOC/yr)

MASPY = maximum amount of material per year (2008 tons material/yr) [This is based on the Maximum Annual Production which is assumed to be 8 batches per day, 5 days per week and 48 weeks per year; therefore, no further record keeping is required.]

UVOC = uncontrolled VOC [assume 4.44×10^{-4} lbs VOC/lb of rubber]*

ASU = Annual Solvent Usage (1200 gallons/yr)

CVOC = VOC content of the cleaning solvent (7.2 lbs VOC/gal.)

EF = 10% x CE

where:

CE = control efficiency (1 - 0.906)

CONV = conversion factor (1 ton/2000 lbs)

* Reference: Maximum value from draft AP-42 Section 4.12, Table 4.12-4 Internal Mixing and Milling Emission Factors for manufacture of Rubber Products.

5. Emission Limitations:

58.3 tons VOC/rolling, 30-day period (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020 combined)

180 tons VOC/rolling, 365-day period (for emissions units P001, P002, P003, P004, P005, P008, P009, P011, P013, P015, P016, P017, P018 and P020 combined)

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Sections A.III.1 and 2 of this permit.

6. Emission Limitation:

Minimum overall control efficiency of 90.6% of VOC, by weight

Applicable Compliance Methods:

The permittee shall demonstrate compliance with the control requirements above in accordance with the record keeping requirements specified in Sections A.III.1 and 2 of this permit.

7. Emission Limitation:

VOC content not to exceed 45%, by weight

Applicable Compliance Methods:

Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

The permittee shall employ USEPA Method 24 or formulation data to determine the VOC contents of all the materials.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P020 - Planetary mixing system	OAC rule 3745-31-05	LIMIT(s)

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

NEW SOURCE REVIEW FORM B

PTI Number: 05-12092

Facility ID: 0575010161

FACILITY NAME Thermoseal IncFACILITY DESCRIPTION Planetary mixing system CITY/TWP SidneySIC CODE 3053 SCC CODE _____ EMISSIONS UNIT ID P020EMISSIONS UNIT DESCRIPTION Planetary mixing system

DATE INSTALLED _____

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	lbs / hr	1.94	1.86	1.94	1.86
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	lbs / hr	0.26	0.12	0.26	0.12
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination: The emissions unit shall be equipped with a solvent capture and recovery system that is capable of reducing the overall VOC emissions by at least 90.6%, by weight, based on a 30-day rolling period.

In order to assure compliance, the permittee shall maintain records that demonstrate compliance with the maintenance and monitoring standards as established in the 1999 mass balance protocol agreement between the Ohio Environmental Protection Agency and the permittee.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

