

emission levels which exceed five tons per year. Recordkeeping requirements for the control device are covered by paragraph (B)(3).

(OO) *Armco Steel Company, Middletown (Cincinnati Area)*

RACT for this facility involves the use of rolling oil, rust preventative oil, pre-lube oil and anti-galling material with the lowest available VOC content. USEPA cited deficiencies in the rule as a result of the company's failure to demonstrate that the VOC content of rolling oil and anti-galling material used is the lowest available. For anti-galling material, this deficiency has been corrected through the use of a water-based material. A Finding will state a new limit on pounds of VOC per gallon of anti-galling material. For rolling oil, this deficiency has been addressed through provision of correspondence with vendors stating that the oil in use has the lowest VOC content available. The Finding will correct the limit on VOC content per gallon for rolling oil and rust preventative oil, and provide a VOC content limit for pre-lube oil. Previous limits in the rule were based on an incorrect application of ASTM method D2369-81 to the oils in use. Actual emissions of VOCs per gallon of oil applied are a small fraction of the total VOC content, since most of the oil is recovered and recycled. Additional USEPA concerns about the lack of recordkeeping and reporting requirements have been addressed by making Rule 09(OO) subject to the recordkeeping and reporting requirements in paragraph (B)(3).

(PP) *Formica Corporation, Cincinnati*

The deficiency previously cited by USEPA (lack of sufficient recordkeeping requirements) has been corrected by subjecting this source to the requirements of paragraph (B)(3).

(QQ) *DayGlo Color Corporation, Cleveland*

This rule requires the company to use a vacuum system consisting of a vacuum pump and condenser as a filtration system which separates methanol from solid dye. Each mixing vessel larger than 400 gallons must be completely covered at all times, except when the vessel is empty or being emptied, and except for small openings for the mixer shaft and for adding materials to the vessel.

(SS) *Ritrama Duramark, Cleveland*

Ritrama Duramark operates two lines which apply coatings to a continuous web. Line 1 is a vinyl casting line and line 2 applies adhesives to paper. Line

2 is covered by the paper coating rule—09(F). The vinyl film casting line, covered by (SS), applies a vinyl organosol to a paper substrate in order to create a vinyl casting. The vinyl is then dried in an oven which is vented to an incinerator. The rule requires 100 percent capture efficiency and 98 percent destruction of VOCs from this line.

(TT) *ICI Americas, Perry*

The rule requires that emissions from stage 1 and stage 2 reactor vent streams be vented to a flare which meets the requirement of OAC 3745-21-09(DD)(10)(d), and the diked area of the carbon disulfide tanks must be completely covered by styrofoam sheets in order to reduce VOC emissions. Control on distillation vents was determined to be economically infeasible.

(YY) *PMC Specialties Group, Cincinnati*

PMC manufactures methyl anthranilate (MA), anthranilic acid (AA); saccharin, and o-carboalkoxybenzenesulfonamide (OCBS). The rule requires that emissions from the MA and AA process reactor vent streams be vented to an enclosed combustion device that is designed and operated to achieve at least a 95 percent reduction in VOC emissions. Under this rule, the OCBS manufacturing process is required to limit its emissions to 12 pounds of VOC per 6,000 pounds of product, which results in a 90 percent reduction in VOC emissions. Controls on emissions from the saccharin manufacturing process were evaluated by OEPA and found to be technically or economically infeasible.

(ZZ) *Firestone Synthetic Rubber & Latex Company, Akron*

All reactor process vent streams must be vented to an enclosed combustion device achieving 98 percent reduction, or to a flare which meets the requirements of paragraph (DD)(10)(d). An exemption is made for process vent streams vented to a flare constructed prior to March 21, 1993, which is maintained in accordance with design specifications.

(AAA) *Reilly Industries, Cleveland*

Reilly refines crude coal tar, producing "front end" naphthalene oil products, creosote oil, heavy (enamel) oil, electrode binder pitch, pellet pitch, roofing tar, and road tar. The facility's major emissions sources include: storage tanks for crude product; eight distillation stills (in two "batteries" of four each—one battery for continuous

processing, the other for batch processing), and storage tanks for refined products. The distillation stills are covered by OAC 3745-21-07 (G), which requires 85 percent destruction of VOCs emissions. USEPA concerns about the enforceability of paragraph 07 (G) will be addressed in a Finding and Order which affirms that the stills are covered by this rule, and which clarifies the test methods to be used to measure VOCs. The rule requires 90 percent control on each storage tank larger than 40,000 gallons which contains crude coal tar, refined tar or front end oil; this rule does not cover tanks containing creosote oil and solution oil. However, the low volatility of these products leads to low emissions, eliminating the need for add-on controls. Storage tanks with controls built before July 1, 1992 are exempt from the 90 percent control requirement, but must be operated and maintained in accordance with design specifications.

(BBB) *BF Goodrich, Akron Chemical Plant*

The rule requires that emissions from the agerite resin D process be vented to a control device which achieves 90 percent control efficiency; emissions from the superlite (trademark) and diphenylamine-based antioxidants process must be vented to control devices achieving 95 percent control efficiency.

The schedules for compliance with each of these rules are contained in OAC 3745-21-04(C)(40-51,53,54,59-62). Rules (C)(42), (C)(43), (C)(44), (C)(45) and (C)(47) were approved in the March 23, 1995 **Federal Register** (60 FR 15235-15241). The remaining schedules are timely, and are approved.

In addition to the non-CTG VOC RACT rules contained in OAC 3745-21-09, OEPA has committed to submit a Finding and Order for Sprayon Products, in Bedford Heights, which establishes a generic VOC RACT limit of 81 percent reduction from the 1990 baseline. This limit will be based on VOC emissions per can filled, thereby allowing changes in production not to affect the percent control limit. Operations which already meet a federally-enforceable RACT requirement, or which have combined annual emissions of less than five tons per year will be exempt from the baseline and the 81 percent reduction requirement. The facility will be allowed one year to petition OEPA and USEPA for an alternative control plan if it can be demonstrated that the 81 percent control requirement is not technically or economically feasible.