

Synthetic Minor Determination and/or Netting Determination

Permit To Install **08-04706**

A. Source Description

Dayton Polymeric Products (DPP) operates a polyurethane foam products manufacturing facility in Dayton, Ohio (Montgomery County). In the polyurethane foam manufacturing process mold release solution is sprayed into the mold prior to filling it with the two part mixture of polyurethane resin and isocyanate. The mold release is sprayed by robots into the mold using HVLP paint guns.

This PTI is a Chapter 31 modification of PTI 08-04566 for the existing emissions units (P001, P003, P004, P005 and P006) to accommodate an increase in mold release solution use, decrease the amount of paint and thinner used in emissions unit P001 and to discontinue the use of paint in emissions unit P003. This PTI also addresses the installation of two new emissions units (P007 and P008) that are switching from water based to solvent based mold release solutions. These changes will cause potential emissions from DPP increase to 145 tons per year (TPY) of organic compounds (OC) and potential hazardous air pollutant (HAP) emissions are 2.83 TPY of individual HAP (xylene) and 5.11 TPY of combined HAP.

B. Facility Emissions and Attainment Status

DPP is located in Montgomery County which is currently designated as non-attainment with the National Ambient Air Quality Standards (NAAQS) for ozone. DPP is currently classified as a synthetic minor source for Title V permit requirements by limiting individual HAP (toluene) emissions to less than 9.9 TPY. After implementing the modifications requested as part of this modification DPP will no longer have potential HAP emissions greater than major source levels. DPP currently operates as a minor source with regard to non-attainment New Source Review (NSR) requirements, however the potential OC emissions from DPP will increase to 145 TPY. This level of potential OC emissions is greater than the major source threshold (100 TPY OC) for non-attainment NSR and Title V permitting requirements.

C. Source Emissions

The potential and proposed allowable emissions from each of the emissions units are summarized in Table 1. and Table 2.

Table 1. Potential Air Emissions

EU	P001*	P003	P004	P005	P006	P007	P008	Total
OC (TPY)	5.74	7.65	25.3	39.3	33.3	25.4	7.65	144.4
Toluene (TPY)	1.46	0.03	0.13	0.18	0.17	0.12	0.03	2.12
Xylene (TPY)	0.00	0.16	0.53	0.80	0.68	0.52	0.16	2.85
Benzene (TPY)	0.00	0.01	0.01	0.02	0.01	0.01	0.01	0.07
MEK (TPY)	0.04	0	0	0	0	0	0	0.04
Combined HAP (TPY)	1.51	0.20	0.67	1.00	0.86	0.65	0.20	5.10

* Represents worst case, 8,760 hours x mold release use for OC and coating and thinner use for HAPs.

DPP is potentially a major source of OC emissions as defined by Title V and Non-attainment NSR requirements (145 TPY). With regard to HAP emissions, DPP is not a major source of combined or individual HAP emissions (5.1 TPY combined, 2.85 TPY xyxlene).

Table 2. Allowable Air Emissions Rates

EU	P001	P003	P004	P005	P006	P007	P008	Total
OC (lbs/hour)	1.31	1.75	5.93	8.98	7.61	5.80	1.75	n/a
OC (TPY)	4.18	2.99	15.0	15.0	20.6	15.0	6.18	78.8
Toluene (TPY)	0.75	0.02	0.07	0.07	0.09	0.07	0.03	1.12
Xylene (TPY)	0.06	0.06	0.30	0.30	0.42	0.30	0.13	1.52
Benzene (TPY)	0.00	0.00	0.01	0.01	0.01	0.01	0.00	0.04
MEK (TPY)	0.02	n/a	n/a	n/a	n/a	n/a	n/a	0.03
Combined HAP (TPY)	0.85	0.08	0.39	0.39	0.52	0.39	0.16	2.78
gallons/year restriction	1,320*	960	4,800	4,800	6,600	4,800	1,980	25,260

*Combined use 360 gallons paint and thinner, plus 960 gallons mold release

DPP has requested that the allowable emissions rates and material usage rates in Table 2 be established as federally enforceable operating restrictions on a 12 month rolling basis to prevent triggering major source permitting requirements OC emissions.

D. Conclusion

DPP will be issued a synthetic minor PTI to limit coating, thinner, and mold release usage and rolling 12 month emissions rates of OC to 78.8 TPY. These restrictions will limit the increase in OC emissions from this project to below major source thresholds for Title V and non-attainment NSR. Monthly monitoring, record keeping and calculations, along with quarterly deviation reports for all of the emissions units will be required to monitor compliance. Therefore, through federally enforceable terms and conditions and record keeping requirements, DPP will not trigger major permitting requirements for Title V for OC emissions or major non-attainment NSR requirements for ozone.



State of Ohio Environmental Protection Agency

RE: DRAFT PERMIT TO INSTALL
MONTGOMERY COUNTY

CERTIFIED MAIL

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:
Lazarus Gov.
Center

Application No: 08-04706
Fac ID: 0857043129

DATE: 8/30/2005

Dayton Polymeric Products
Jim Hartings
3337 N Dixie Dr
Dayton, OH 454145645

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 **\$1300** 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

CC: USEPA RAPCA Miami Valley Regional Planning Commission KY IN

MONTGOMERY COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 08-04706 FOR AN AIR CONTAMINANT SOURCE FOR
Dayton Polymeric Products**

On 8/30/2005 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Dayton Polymeric Products**, located at **3337 N Dixie Dr, Dayton**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 08-04706:

Installation of two new foam molding lines and modification of five existing lines.

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.

John Paul, Regional Air Pollution Control Agency, 117 South Main Street, Dayton, OH 45422-1280
[(937)225-4435]



**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 08-04706

Application Number: 08-04706
Facility ID: 0857043129
Permit Fee: **To be entered upon final issuance**
Name of Facility: Dayton Polymeric Products
Person to Contact: Jim Hartings
Address: 3337 N Dixie Dr
Dayton, OH 454145645

Location of proposed air contaminant source(s) [emissions unit(s)]:
**3337 N Dixie Dr
Dayton, Ohio**

Description of proposed emissions unit(s):
Installation of two new foam molding lines and modification of five existing lines.

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

Dayton Polymeric Products

PTI Application: 08-04706

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 0857043129

A. 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

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping 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 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 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. Records Retention Requirements

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.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections,

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conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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 verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. 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 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. 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 emissions unit(s) that is (are) served by such control system(s).

6. 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.

7. 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.

8. 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.

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9. 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.

10. 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.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available

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Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This 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 emissions unit(s) covered by this permit.

14. 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.

15. 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.

B. 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>
Organic Compounds	78.8

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
P001 - Energy Absorbing Foam Molding Line No. 6 *Modification	OAC rule 3745-31-05(A)(3)	The organic compound (OC) emissions from this emissions unit shall not exceed 1.31 lbs/hour, 31.5 lbs/day and 4.18 tons per year (TPY).
		See A.2.a
	OAC rule 3745-31-05(C) OAC rule 3745-35-07(B) (Synthetic minor to avoid non-attainment provisions and Title V)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-35-07(B) and 3745-31-05(C).
	OAC rule 3745-21-07(G)(2)	The OC emissions from emissions units P001, P003, P004, P005, P006, P007 and P008 shall not exceed 78.8 TPY based upon a rolling, 12-month summation of the monthly OC emissions.
		The emission limitations specified by this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

Dayco
PTI A

Emissions Unit ID: P001

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2. Additional Terms and Conditions

2.a The 1.31 pounds of OC per hour and 31.5 lbs OC per day limitations were established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

B. Operational Restrictions

1. The OC content of the coatings and thinning solvents used in this emissions unit shall not exceed 6.58 pounds of OC per gallon of coating and thinning solvent applied.
2. The OC content of the mold release used in this emissions unit shall not exceed 6.24 pounds of OC per gallon of mold release applied.
3. The maximum coating and thinning solvent combined usage for this emissions unit shall not exceed 360 gallons based upon a rolling 12-month summation. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the coating and thinning solvent usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating and Thinning Solvent Usage (gallons)</u>
1	30
1-2	60
2-3	90
3-4	120
4-5	150
5-6	180
6-7	210
7-8	240
8-9	270
9-10	300
10-11	330
11-12	360

After the first 12 calendar months of operation following issuance of this permit, compliance with the annual coating and thinning solvent usage limitation shall be based upon a rolling 12-month summation.

4. The maximum mold release usage for this emissions unit shall not exceed 960 gallons

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Emissions Unit ID: **P001**

based upon a rolling 12-month summation. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the mold release usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Mold Release Usage (gallons)</u>
1	80
1-2	160
2-3	240
3-4	320
4-5	400
5-6	480
6-7	560
7-8	640
8-9	720
9-10	800
10-11	880
11-12	960

After the first 12 calendar months of operation following issuance of this permit, compliance with the annual mold release usage limitation shall be based upon a rolling 12-month summation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P001, P003, P004, P005, P006, P007 and P008:
 - a. The name and identification number of each mold release, coating, and thinning solvent, as applied in each emissions unit.
 - b. The volume, in gallons, of each mold release, coating, and thinning solvent applied in each emissions unit.
 - c. The OC content of each mold release, coating, and thinning solvent, in pounds of OC per gallon, as applied.
 - d. The total OC emissions for all mold release, coatings, and thinning solvents applied, in tons per month from each emissions unit (the sum of b x c for each mold release, coating, and thinning solvent divided by 2,000 lbs/ton).

**Dayto
PTI A**Emissions Unit ID: **P001****Issued: To be entered upon final issuance**

- e. The rolling, 12-month summation of the monthly OC emissions from emissions units P001, P003, P004, P005, P006, P007 and P008 (the sum of the monthly emissions rates calculated in d for the previous 12 months for each emissions unit).
2. The permittee shall collect and record the following information for the purpose of determining annual OC emissions from this emissions unit:
 - a. The total annual coating and thinning solvent use and mold release use, in gallons.
 - b. The total annual OC emissions from all coating and thinning solvent use and mold release use, in tons.
 3. The permit to install for this emissions unit (P001) was evaluated based on the actual materials (typically coatings) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene

TLV (mg/m³): 188.4 mg/m³

Maximum Hourly Emission Rate (lbs/hr): 0.33 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 49.2 ug/m³MAGLC (ug/m³): 4486 ug/m³

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make

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the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of:
 - a. All days when the OC content of the coatings and thinning solvents used in this emissions unit shall not exceed 6.58 pounds of OC per gallon of coating and thinning solvent applied.
 - b. All days when the OC content of the mold release used in this emissions unit shall not exceed 6.24 pounds of OC per gallon of mold release applied.
 - c. All exceedances of the rolling, 12-month coating and thinning solvent usage limitation and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative coating and thinning solvent usage levels.
 - d. All exceedances of the rolling, 12-month mold release usage limitation and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative mold release usage levels.
 - e. All exceedances of the rolling 12-month OC emissions limitation from emissions units P001, P003, P004, P005, P006, P007, and P008.

The quarterly deviation (excursion) reports shall be submitted as specified in section A.2.b of the General Terms and Conditions.

2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) for this emissions unit that specify:
 - a. The rolling 12 month annual coating and thinning solvent and mold release usages, in gallons.
 - b. The total OC emissions, in tons, from all coatings and thinning solvents and mold release as applied.

These reports shall be submitted by April 15 of each year and shall cover the previous calendar year.

E. Testing Requirements

**Dayco
PTI A**Emissions Unit ID: **P001****Issued: To be entered upon final issuance**

1. Compliance with the emissions limitations in section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation -
The OC emissions from this emissions unit shall not exceed 1.31 lbs/hour.

Applicable Compliance Method -
Compliance with the hourly allowable OC emission limitation may be determined as follows:
 - i. multiply the maximum OC content of all the coatings (lbs OC/gallon) by the maximum coatings usage rate (gallons/hr);
 - ii. multiply the maximum OC content of all thinning materials (lbs OC/gallon) by the maximum thinner usage rate (gallons/hr);
 - iii. multiply the maximum OC content of all the mold release (lbs OC/gallon) by the maximum mold release usage rate (gallons/hr); and
 - iv. the sum of i thru iii.

- b. Emission Limitation -
The OC emissions from this emissions unit shall not exceed 31.5 lbs/day.

Applicable Compliance Method -

The 31.5 lbs OC /day limitation was developed by multiplying the hourly emissions limit by the maximum operating schedule of 24 hours/day. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the daily limitation.

- c. Emission Limitation:
The OC emissions from this emissions unit shall not exceed 4.18 TPY.

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.2 and shall be determined by summing the monthly usage, in gallons, of each coating and thinning solvent and mold release used in this emission unit multiplied by its OC content, in pounds per gallon, divided by 2000 pounds per ton, for each year.

- d. Emission Limitation:
The OC emissions from emissions units P001, P003, P004, P005, P006, P007 and P008 shall not exceed 78.8 TPY based upon a rolling, 12-month summation of the monthly OC emissions.

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.1. and shall be determined by the sum of the rolling, 12-month usage, in gallons, of each mold release, coating and thinning solvent multiplied by its OC content, in pounds per gallon, divided by 2,000 lbs/ton.

F. Miscellaneous Requirements

1. Compliance with the rolling OC emission limitations in section A.1 and the monitoring, record keeping, reporting and testing requirements in sections C.1, D.1, and E.1.d for this emissions unit are federally enforceable.
2. This PTI is a modification of PTI 08-04566 for this emissions unit to reflect current material usage rates and coating and thinner composition. The allowable OC emissions rate for this emissions unit has decreased from 2.9 lbs/hour, 37.7 lbs/day and 6.89 TPY to 1.31 lbs/hour, 31.5 lbs/day and 4.18 TPY.

Dayco**PTI A**Emissions Unit ID: **P003****Issued: To be entered upon final issuance**

ensure compliance with this limitation.

B. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5) in this emissions unit is prohibited. Prior to employing any photochemically reactive materials, the permittee shall provide written notification to, and obtain approval from, the Ohio EPA field office. Such notification shall include information sufficient to determine that the emissions associated with the proposed change in materials will comply with the emission limits and/or control requirements as defined in OAC 3745-21-07(G)(2). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.
2. The OC content of the mold release used in this emissions unit shall not exceed 6.24 pounds of OC per gallon of mold release applied.
3. The maximum mold release usage for this emissions unit shall not exceed 960 gallons based upon a rolling 12-month summation. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the mold release usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Mold Release Usage (gallons)</u>
1	80
1-2	160
2-3	240
3-4	320
4-5	400
5-6	480
6-7	560
7-8	640
8-9	720
9-10	800
10-11	880
11-12	960

After the first 12 calendar months of operation following issuance of this permit, compliance with the annual mold release usage limitation shall be based upon a rolling 12-month summation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P001, P003, P004, P005, P006, P007 and P008:
 - a. The company identification of each mold release, coating, and thinning solvent, as applied in each emissions unit.
 - b. The volume, in gallons, of each mold release, coating, and thinning solvent applied in each emissions unit.
 - c. The OC content of each mold release, coating, and thinning solvent, in pounds of OC per gallon, as applied.
 - d. The total OC emissions for all mold release, coatings, and thinning solvents applied, in tons per month from each emissions unit (the sum of b x c for each mold release, coating and thinning solvent divided by 2,000 lbs/ton).
 - e. The rolling, 12-month summation of the monthly OC emissions from emissions units P001, P003, P004, P005, P006, P007 and P008 (the sum of the monthly emissions rates calculated in d for the previous 12 months for each emissions unit).
2. The permittee shall collect and record the following information for the purpose of determining annual OC emissions from this emissions unit:
 - a. The total annual mold release use, in gallons.
 - b. The total annual OC emissions from all mold release use, in tons.
3. The permit to install for this emissions unit (P003) was evaluated based on the actual materials (typically coatings) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

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Emissions Unit ID: **P003**

Pollutant: hydrocarbon naphtha

TLV (mg/m3): 572,597 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 0.85 lbs/hr

Issued: To be entered upon final issuance

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 127 ug/m3

MAGLC (ug/m3): 5,726 ug/m3

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
 5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

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- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of:
 - a. All days when the OC content of the mold release used in this emissions unit shall not exceed 6.24 pounds of OC per gallon of mold release applied.
 - b. All exceedances of the rolling, 12-month mold release usage limitation and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative mold release usage levels.
 - c. All exceedances of the rolling 12-month OC emissions limitation from emissions units P001, P003, P004, P005, P006, P007, and P008.

The quarterly deviation (excursion) reports shall be submitted as specified in section A.2.b of the General Terms and Conditions.

2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) for this emissions unit that specify:
 - a. The rolling 12 month mold release usage, in gallons.
 - b. The total OC emissions, in tons, from all mold release applied.

These reports shall be submitted by April 15 of each year and shall cover the previous calendar year.

E. Testing Requirements

**Dayco
PTI A**

Emissions Unit ID: **P003**

Issued: To be entered upon final issuance

1. Compliance with the emissions limitations in section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation -
The OC emissions from this emissions unit shall not exceed 1.75 lbs/hour.

Applicable Compliance Method -

Compliance with the hourly allowable OC emission limitation may be determined by multiplying the maximum OC content of the mold release (lbs OC/gallon) by the maximum mold release usage rate (gallons/hr).

Dayto**PTI A**Emissions Unit ID: **P003****Issued: To be entered upon final issuance**

- b. Emission Limitation:
The OC emissions from this emissions unit shall not exceed 3.74 TPY.

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.2 and shall be determined by summing the monthly usage, in gallons, of each mold release used in this emission unit multiplied by its OC content, in pounds per gallon, divided by 2000 pounds per ton, for each year.

- c. Emission Limitation:
The OC emissions from emissions units P001, P003, P004, P005, P006, P007 and P008 shall not exceed 78.8 TPY based upon a rolling, 12-month summation of the monthly OC emissions.

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.1. and shall be determined by the sum of the rolling, 12 month usage, in gallons, of each mold release, coating and thinning solvent multiplied by its OC content, in pounds per gallon.

F. Miscellaneous Requirements

1. Compliance with the rolling OC emission limitations in section A.1 and the monitoring, record keeping, reporting and testing requirements in sections C.1, D.1, and E.1.d for this emissions unit are federally enforceable.
2. This PTI is a modification of PTI 08-04566 for this emissions unit to switch from coating and mold release application to the use of mold release only. The allowable OC emissions rate for this emissions unit has decreased from 2.9 lbs/hour and 6.89 TPY to 1.75 lbs/hour, and 2.99 TPY.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
P004 - Energy Absorbing Foam Molding Line No. 1 *Modification	OAC rule 3745-31-05(A)(3)	The organic compound (OC) emissions from this emissions unit shall not exceed 5.92 lbs/hour and 15.0 tons per year (TPY).
		See A.2.a
	OAC rule 3745-31-05(C) OAC rule 3745-35-07(B) (Synthetic minor to avoid non-attainment provisions and Title V)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-35-07(B) and 3745-31-05(C).
	OAC rule 3745-21-07(G)(2)	The OC emissions from emissions units P001, P003, P004, P005, P006, P007 and P008 shall not exceed 78.8 TPY based upon a rolling, 12-month summation of the monthly OC emissions.
		See B.1.

2. Additional Terms and Conditions

- 2.a The 5.92 pounds of OC per hour limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to

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PTI A

Issued: To be entered upon final issuance

ensure compliance with this limitation.

Emissions Unit ID: **P004**

Dayco**PTI A**Emissions Unit ID: **P004****Issued: To be entered upon final issuance****B. Operational Restrictions**

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5) in this emissions unit is prohibited. Prior to employing any photochemically reactive materials, the permittee shall provide written notification to, and obtain approval from, the Ohio EPA field office. Such notification shall include information sufficient to determine that the emissions associated with the proposed change in materials will comply with the emission limits and/or control requirements as defined in OAC 3745-21-07(G)(2). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.
2. The OC content of the mold release used in this emissions unit shall not exceed 6.24 pounds of OC per gallon of mold release applied.
3. The maximum mold release usage for this emissions unit shall not exceed 4,800 gallons based upon a rolling 12-month summation. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the mold release usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Mold Release Usage (gallons)</u>
1	400
1-2	800
2-3	1,200
3-4	1,600
4-5	2,000
5-6	2,400
6-7	2,800
7-8	3,200
8-9	3,600
9-10	4,000
10-11	4,400
11-12	4,800

After the first 12 calendar months of operation following issuance of this permit, compliance with the annual mold release usage limitation shall be based upon a rolling 12-month summation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P001, P003, P004, P005, P006, P007 and P008:
 - a. The company identification of each mold release, coating, and thinning solvent, as applied in each emissions unit.
 - b. The volume, in gallons, of each mold release, coating, and thinning solvent applied in each emissions unit.
 - c. The OC content of each mold release, coating, and thinning solvent, in pounds of OC per gallon, as applied.
 - d. The total OC emissions for all mold release, coatings, and thinning solvents applied, in tons per month from each emissions unit (the sum of $b \times c$ for each mold release, coating and thinning solvent divided by 2,000 lbs/ton).
 - e. The rolling, 12-month summation of the monthly OC emissions from emissions units P001, P003, P004, P005, P006, P007 and P008 (the sum of the monthly emissions rates calculated in d for the previous 12 months for each emissions unit).
2. The permittee shall collect and record the following information for the purpose of determining annual OC emissions from this emissions unit:
 - a. The total annual mold release use, in gallons.
 - b. The total annual OC emissions from all mold release use, in tons.
3. The permit to install for this emissions unit (P004) was evaluated based on the actual materials (typically coatings) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: hydrocarbon naphtha

Dayco**PTI A**Emissions Unit ID: **P004****Issued: To be entered upon final issuance**TLV (mg/m³): 572,597 mg/m³

Maximum Hourly Emission Rate (lbs/hr): 2.89 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 431 ug/m³MAGLC (ug/m³): 5,726 ug/m³

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of:
 - a. All days when the OC content of the mold release used in this emissions unit shall not exceed 6.24 pounds of OC per gallon of mold release applied.
 - b. All exceedances of the rolling, 12-month mold release usage limitation and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative mold release usage levels.
 - c. All exceedances of the rolling 12-month OC emissions limitation from emissions units P001, P003, P004, P005, P006, P007, and P008.

The quarterly deviation (excursion) reports shall be submitted as specified in section A.2.b of the General Terms and Conditions.

2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) for this emissions unit that specify:
 - a. The rolling 12 month mold release usage, in gallons.
 - b. The total OC emissions, in tons, from all mold release applied.

These reports shall be submitted by April 15 of each year and shall cover the previous

calendar year.

E. Testing Requirements

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

- a. Emission Limitation -

The OC emissions from this emissions unit shall not exceed 5.92 lbs/hour.

Applicable Compliance Method -

Compliance with the hourly allowable OC emission limitation may be determined by multiplying the maximum OC content of the mold release (lbs OC/gallon) by the maximum mold release usage rate (gallons/hr).

Dayco**PTI A**Emissions Unit ID: **P004****Issued: To be entered upon final issuance**

- b. Emission Limitation:
The OC emissions from this emissions unit shall not exceed 15.0 TPY.

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.2 and shall be determined by summing the monthly usage, in gallons, of each mold release multiplied by its OC content, in pounds per gallon, for each year.

- c. Emission Limitation:
The OC emissions from emissions units P001, P003, P004, P005, P006, P007 and P008 shall not exceed 78.8 TPY based upon a rolling, 12-month summation of the monthly OC emissions.

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.1. and shall be determined by the sum of the rolling, 12-month usage, in gallons, of each mold release, coating and thinning solvent multiplied by its OC content, in pounds per gallon.

F. Miscellaneous Requirements

1. Compliance with the rolling OC emission limitations in section A.1 and the monitoring, record keeping, reporting and testing requirements in sections C.1, D.1, and E.1.d for this emissions unit are federally enforceable.
2. This PTI is a modification of PTI 08-04566 for this emissions unit for an increase hourly mold release usage. The allowable OC emissions rate for this emissions unit increased from 3.02 lbs/hour, and 13.25 TPY to 5.92 lbs/hour, and 15.0 TPY.

Dayco

PTI A

Emissions Unit ID: P005

Issued: To be entered upon final issuance

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. 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>
P005 - Energy Absorbing Foam Molding Line No. 2 *Modification	OAC rule 3745-31-05(A)(3)	The organic compound (OC) emissions from this emissions unit shall not exceed 8.98 lbs/hour and 15.0 tons per year (TPY).
		See A.2.a
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-35-07(B) and 3745-31-05(C).
	OAC rule 3745-31-05(C) OAC rule 3745-35-07(B) (Synthetic minor to avoid non-attainment provisions and Title V)	The OC emissions from emissions units P001, P003, P004, P005, P006, P007 and P008 shall not exceed 78.8 TPY based upon a rolling, 12-month summation of the monthly OC emissions.
	OAC rule 3745-21-07(G)(2)	See B.1.

2. Additional Terms and Conditions

- 2.a The 8.98 pounds of OC per hour limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to

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Emissions Unit ID: P005

ensure compliance with this limitation.

Dayco**PTI A****Issued: To be entered upon final issuance**Emissions Unit ID: **P005****B. Operational Restrictions**

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5) in this emissions unit is prohibited. Prior to employing any photochemically reactive materials, the permittee shall provide written notification to, and obtain approval from, the Ohio EPA field office. Such notification shall include information sufficient to determine that the emissions associated with the proposed change in materials will comply with the emission limits and/or control requirements as defined in OAC 3745-21-07(G)(2). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.
2. The OC content of the mold release used in this emissions unit shall not exceed 6.24 pounds of OC per gallon of mold release applied.
3. The maximum mold release usage for this emissions unit shall not exceed 4,800 gallons based upon a rolling 12-month summation. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the mold release usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Mold Release Usage (gallons)</u>
1	400
1-2	800
2-3	1,200
3-4	1,600
4-5	2,000
5-6	2,400
6-7	2,800
7-8	3,200
8-9	3,600
9-10	4,000
10-11	4,400
11-12	4,800

After the first 12 calendar months of operation following issuance of this permit, compliance with the annual mold release usage limitation shall be based upon a rolling 12-month summation.

C. Monitoring and/or Recordkeeping Requirements

Issued: To be entered upon final issuance

1. The permittee shall collect and record the following information each month for emissions units P001, P003, P004, P005, P006, P007 and P008:
 - a. The company identification of each mold release, coating, and thinning solvent, as applied in each emissions unit.
 - b. The volume, in gallons, of each mold release, coating, and thinning solvent applied in each emissions unit.
 - c. The OC content of each mold release, coating, and thinning solvent, in pounds of OC per gallon, as applied.
 - d. The total OC emissions for all mold release, coatings, and thinning solvents applied, in tons per month from each emissions unit (the sum of b x c for each mold release, coating and thinning solvent divided by 2,000 lbs/ton).
 - e. The rolling, 12-month summation of the monthly OC emissions from emissions units P001, P003, P004, P005, P006, P007 and P008 (the sum of the monthly emissions rates calculated in d for the previous 12 months for each emissions unit).
2. The permittee shall collect and record the following information for the purpose of determining annual OC emissions from this emissions unit:
 - a. The total annual mold release use, in gallons.
 - b. The total annual OC emissions from all mold release use, in tons.
3. The permit to install for this emissions unit (P005) was evaluated based on the actual materials (typically coatings) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: hydrocarbon naphtha

TLV (mg/m³): 572,597 mg/m³

Maximum Hourly Emission Rate (lbs/hr): 4.38 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 653 ug/m³

MAGLC (ug/m³): 5,726 ug/m³

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of:
 - a. All days when the OC content of the mold release used in this emissions unit shall not exceed 6.24 pounds of OC per gallon of mold release applied.
 - b. All exceedances of the rolling, 12-month mold release usage limitation and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative mold release usage levels.
 - c. All exceedances of the rolling 12-month OC emissions limitation from emissions units P001, P003, P004, P005, P006, P007, and P008.

The quarterly deviation (excursion) reports shall be submitted as specified in section A.2.b of the General Terms and Conditions.

2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) for this emissions unit that specify:
 - a. The rolling 12 month mold release usage, in gallons.
 - b. The total OC emissions, in tons, from all mold release applied.

These reports shall be submitted by April 15 of each year and shall cover the previous

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Emissions Unit ID: P005

calendar year.

E. Testing Requirements

1. Compliance with the emissions limitations in section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. **Emission Limitation -**
The OC emissions from this emissions unit shall not exceed 8.98 lbs/hour.

Applicable Compliance Method -
Compliance with the hourly allowable OC emission limitation may be determined by multiplying the maximum OC content of the mold release (lbs OC/gallon) by the maximum mold release usage rate (gallons/hr).
 - b. **Emission Limitation:**
The OC emissions from this emissions unit shall not exceed 15.0 TPY.

**Dayco
PTI A**Emissions Unit ID: **P005****Issued: To be entered upon final issuance**

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.2 and shall be determined by summing the monthly usage, in gallons, of each mold release multiplied by its OC content, in pounds per gallon, for each year.

d. Emission Limitation:

The OC emissions from emissions units P001, P003, P004, P005, P006, P007 and P008 shall not exceed 78.8 TPY based upon a rolling, 12-month summation of the monthly OC emissions.

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.1. and shall be determined by the sum of the rolling, 12-month usage, in gallons, of each mold release, coating and thinning solvent multiplied by its OC content, in pounds per gallon.

F. Miscellaneous Requirements

1. Compliance with the rolling OC emission limitations in section A.1 and the monitoring, record keeping, reporting and testing requirements in sections C.1, D.1, and E.1.d for this emissions unit are federally enforceable.
2. This PTI is a modification of PTI 08-04566 for this emissions unit for an increase hourly mold release usage. The allowable OC emissions rate for this emissions unit increased from 3.02 lbs/hour, and 13.25 TPY to 8.98 lbs/hour, and 15.0 TPY.

Dayco

PTI A

Emissions Unit ID: P006

Issued: To be entered upon final issuance

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. 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>
P006 - Energy Absorbing Foam Molding Line No. 8 *Modification	OAC rule 3745-31-05(A)(3)	The organic compound (OC) emissions from this emissions unit shall not exceed 7.61 lbs/hour and 20.6 tons per year (TPY).
		See A.2.a
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-35-07(B) and 3745-31-05(C).
	OAC rule 3745-31-05(C) OAC rule 3745-35-07(B) (Synthetic minor to avoid non-attainment provisions and Title V)	The OC emissions from emissions units P001, P003, P004, P005, P006, P007 and P008 shall not exceed 78.8 TPY based upon a rolling, 12-month summation of the monthly OC emissions.
	OAC rule 3745-21-07(G)(2)	See B.1.

2. Additional Terms and Conditions

- 2.a The 7.61 pounds of OC per hour limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to

Dayco**PTI A**Emissions Unit ID: **P006****Issued: To be entered upon final issuance**

ensure compliance with this limitation.

B. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5) in this emissions unit is prohibited. Prior to employing any photochemically reactive materials, the permittee shall provide written notification to, and obtain approval from, the Ohio EPA field office. Such notification shall include information sufficient to determine that the emissions associated with the proposed change in materials will comply with the emission limits and/or control requirements as defined in OAC 3745-21-07(G)(2). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.
2. The OC content of the mold release used in this emissions unit shall not exceed 6.24 pounds of OC per gallon of mold release applied.
3. The maximum mold release usage for this emissions unit shall not exceed 6,600 gallons based upon a rolling 12-month summation. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the mold release usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Mold Release Usage (gallons)</u>
1	550
1-2	1,100
2-3	1,650
3-4	2,200
4-5	2,750
5-6	3,300
6-7	3,850
7-8	4,400
8-9	4,950
9-10	5,500
10-11	6,050
11-12	6,600

After the first 12 calendar months of operation following issuance of this permit, compliance with the annual mold release usage limitation shall be based upon a rolling 12-month summation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions units P001, P003, P004, P005, P006, P007 and P008:
 - a. The company identification of each mold release, coating, and thinning solvent, as applied in each emissions unit.
 - b. The volume, in gallons, of each mold release, coating, and thinning solvent applied in each emissions unit.
 - c. The OC content of each mold release, coating, and thinning solvent, in pounds of OC per gallon, as applied.
 - d. The total OC emissions for all mold release, coatings, and thinning solvents applied, in tons per month from each emissions unit (the sum of $b \times c$ for each mold release, coating and thinning solvent divided by 2,000 lbs/ton).
 - e. The rolling, 12-month summation of the monthly OC emissions from emissions units P001, P003, P004, P005, P006, P007 and P008 (the sum of the monthly emissions rates calculated in d for the previous 12 months for each emissions unit).
2. The permittee shall collect and record the following information for the purpose of determining annual OC emissions from this emissions unit:
 - a. The total annual mold release use, in gallons.
 - b. The total annual OC emissions from all mold release use, in tons.
3. The permit to install for this emissions unit (P006) was evaluated based on the actual materials (typically coatings) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

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Dayto

PTI A

Issued: To be entered upon final issuance

Emissions Unit ID: **P006**

Pollutant: hydrocarbon naphtha

TLV (mg/m3): 572,597 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 3.71 lbs/hr

Issued: To be entered upon final issuance

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 553 ug/m3

MAGLC (ug/m3): 5,726 ug/m3

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
 5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

Dayton Polymeric Products
PTI Application: 08-04706
Issue

Facility ID: 0857043129

Emissions Unit ID: P006

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of:
 - a. All days when the OC content of the mold release used in this emissions unit shall not exceed 6.24 pounds of OC per gallon of mold release applied.
 - b. All exceedances of the rolling, 12-month mold release usage limitation and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative mold release usage levels.
 - c. All exceedances of the rolling 12-month OC emissions limitation from emissions units P001, P003, P004, P005, P006, P007, and P008.

The quarterly deviation (excursion) reports shall be submitted as specified in section A.2.b of the General Terms and Conditions.

2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) for this emissions unit that specify:
 - a. The rolling 12 month mold release usage, in gallons.
 - b. The total OC emissions, in tons, from all mold release applied.

These reports shall be submitted by April 15 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emissions limitations in section A.I.1. of these terms and

**Dayco
PTI A**Emissions Unit ID: **P006****Issued: To be entered upon final issuance**

conditions shall be determined in accordance with the following methods:

a. Emission Limitation -

The OC emissions from this emissions unit shall not exceed 7.61 lbs/hour.

Applicable Compliance Method -

Compliance with the hourly allowable OC emission limitation may be determined by multiplying the maximum OC content of the mold release (lbs OC/gallon) by the maximum mold release usage rate (gallons/hr).

b. Emission Limitation:

The OC emissions from this emissions unit shall not exceed 20.6 TPY.

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.2 and shall be determined by summing the monthly usage, in gallons, of each mold release multiplied by its OC content, in pounds per gallon, for each year.

c. Emission Limitation:

The OC emissions from emissions units P001, P003, P004, P005, P006, P007 and P008 shall not exceed 78.8 TPY based upon a rolling, 12-month summation of the monthly OC emissions.

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.1. and shall be determined by the sum of the rolling, 12-month usage, in gallons, of each mold release, coating and thinning solvent multiplied by its OC content, in pounds per gallon.

F. Miscellaneous Requirements

1. Compliance with the rolling OC emission limitations in section A.1 and the monitoring, record keeping, reporting and testing requirements in sections C.1, D.1, and E.1.d for this emissions unit are federally enforceable.
2. This PTI is a modification of PTI 08-04566 for this emissions unit for an increase hourly mold release usage. The allowable OC emissions rate for this emissions unit increased from 3.02 lbs/hour, and 13.25 TPY to 7.61 lbs/hour, and 20.6 TPY.

Dayton Polymeric Products
 PTI Application: 08-04706
 Issue:

Facility ID: 0857043129

Emissions Unit ID: P007

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
P007 - Energy Absorbing Foam Molding Line No. 3	OAC rule 3745-31-05(A)(3)	The organic compound (OC) emissions from this emissions unit shall not exceed 5.80 lbs/hour and 15.0 tons per year (TPY).
		See A.2.a
	OAC rule 3745-31-05(C) OAC rule 3745-35-07(B) (Synthetic minor to avoid non-attainment provisions and Title V)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-35-07(B) and 3745-31-05(C).
	OAC rule 3745-21-07(G)(2)	The OC emissions from emissions units P001, P003, P004, P005, P006, P007 and P008 shall not exceed 78.8 TPY based upon a rolling, 12-month summation of the monthly OC emissions.
		See B.1.

2. Additional Terms and Conditions

- 2.a The 5.80 pounds of OC per hour limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to

Dayco**PTI A**Emissions Unit ID: **P007****Issued: To be entered upon final issuance**

ensure compliance with this limitation.

B. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5) in this emissions unit is prohibited. Prior to employing any photochemically reactive materials, the permittee shall provide written notification to, and obtain approval from, the Ohio EPA field office. Such notification shall include information sufficient to determine that the emissions associated with the proposed change in materials will comply with the emission limits and/or control requirements as defined in OAC 3745-21-07(G)(2). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.
2. The OC content of the mold release used in this emissions unit shall not exceed 6.24 pounds of OC per gallon of mold release applied.
3. The maximum mold release usage for this emissions unit shall not exceed 4,800 gallons based upon a rolling 12-month summation. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the mold release usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Mold Release Usage (gallons)</u>
1	400
1-2	800
2-3	1,200
3-4	1,600
4-5	2,000
5-6	2,400
6-7	2,800
7-8	3,200
8-9	3,600
9-10	4,000
10-11	4,400
11-12	4,800

After the first 12 calendar months of operation following issuance of this permit, compliance with the annual mold release usage limitation shall be based upon a rolling 12-month summation.

Dayco**PTI A**Emissions Unit ID: **P007****Issued: To be entered upon final issuance****C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each month for emissions units P001, P003, P004, P005, P006, P007 and P008:
 - a. The company identification of each mold release, coating, and thinning solvent, as applied in each emissions unit.
 - b. The volume, in gallons, of each mold release, coating, and thinning solvent applied in each emissions unit.
 - c. The OC content of each mold release, coating, and thinning solvent, in pounds of OC per gallon, as applied.
 - d. The total OC emissions for all mold release, coatings, and thinning solvents applied, in tons per month from each emissions unit (the sum of $b \times c$ for each mold release, coating and thinning solvent divided by 2,000 lbs/ton).
 - e. The rolling, 12-month summation of the monthly OC emissions from emissions units P001, P003, P004, P005, P006, P007 and P008 (the sum of the monthly emissions rates calculated in d for the previous 12 months for each emissions unit).
2. The permittee shall collect and record the following information for the purpose of determining annual OC emissions from this emissions unit:
 - a. The total annual mold release use, in gallons.
 - b. The total annual OC emissions from all mold release use, in tons.
3. The permit to install for this emissions unit (P007) was evaluated based on the actual materials (typically coatings) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Dayton Polymeric Products
PTI Application: 08-04706
Issue

Facility ID: 0857043129

Emissions Unit ID: P007

Pollutant: hydrocarbon naphtha

TLV (mg/m3): 572,597 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 2.83 lbs/hr

Issued: To be entered upon final issuance

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 422 ug/m3

MAGLC (ug/m3): 5,726 ug/m3

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
 5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

Emissions Unit ID: **P007**

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of:
 - a. All days when the OC content of the mold release used in this emissions unit shall not exceed 6.24 pounds of OC per gallon of mold release applied.
 - b. All exceedances of the rolling, 12-month mold release usage limitation and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative mold release usage levels.
 - c. All exceedances of the rolling 12-month OC emissions limitation from emissions units P001, P003, P004, P005, P006, P007, and P008.

The quarterly deviation (excursion) reports shall be submitted as specified in section A.2.b of the General Terms and Conditions.

2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) for this emissions unit that specify:
 - a. The rolling 12 month mold release usage, in gallons.
 - b. The total OC emissions, in tons, from all mold release applied.

These reports shall be submitted by April 15 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emissions limitations in section A.I.1. of these terms and

Issued: To be entered upon final issuance

conditions shall be determined in accordance with the following methods:

- a. Emission Limitation -
The OC emissions from this emissions unit shall not exceed 5.80 lbs/hour.

Applicable Compliance Method -

Compliance with the hourly allowable OC emission limitation may be determined by multiplying the maximum OC content of the mold release (lbs OC/gallon) by the maximum mold release usage rate (gallons/hr).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation based upon the results of emission tests conducted in accordance with Methods 1 - 4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- b. Emission Limitation:
The OC emissions from this emissions unit shall not exceed 15.0 TPY.

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.2 and shall be determined by the monthly usage, in gallons, of each mold release multiplied by its OC content, in pounds per gallon, for each year.

- d. Emission Limitation:
The OC emissions from emissions units P001, P003, P004, P005, P006, P007 and P008 shall not exceed 78.8 TPY based upon a rolling, 12-month summation of the monthly OC emissions.

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.1. and shall be determined by the sum of the rolling, 12-month usage, in gallons, of each mold release, coating and thinning solvent multiplied by its OC content, in pounds per gallon.

F. Miscellaneous Requirements

1. Compliance with the rolling OC emission limitations in section A.1 and the monitoring, record keeping, reporting and testing requirements in sections C.1, D.1, and E.1.d for this emissions unit are federally enforceable.

Dayco

PTI A

Emissions Unit ID: P008

Issued: To be entered upon final issuance

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. 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>
P008 - Energy Absorbing Foam Molding Line No. 9	OAC rule 3745-31-05(A)(3)	The organic compound (OC) emissions from this emissions unit shall not exceed 1.75 lbs/hour and 6.18 tons per year (TPY).
		See A.2.a
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-35-07(B) and 3745-31-05(C).
	OAC rule 3745-31-05(C) OAC rule 3745-35-07(B) (Synthetic minor to avoid non-attainment provisions and Title V)	The OC emissions from emissions units P001, P003, P004, P005, P006, P007 and P008 shall not exceed 78.8 TPY based upon a rolling, 12-month summation of the monthly OC emissions.
	OAC rule 3745-21-07(G)(2)	See B.1.

2. Additional Terms and Conditions

- 2.a The 1.75 pounds of OC per hour limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to

ensure compliance with this limitation.

B. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5) in this emissions unit is prohibited. Prior to employing any photochemically reactive materials, the permittee shall provide written notification to, and obtain approval from, the Ohio EPA field office. Such notification shall include information sufficient to determine that the emissions associated with the proposed change in materials will comply with the emission limits and/or control requirements as defined in OAC 3745-21-07(G)(2). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.
2. The OC content of the mold release used in this emissions unit shall not exceed 6.24 pounds of OC per gallon of mold release applied.
3. The maximum mold release usage for this emissions unit shall not exceed 1,980 gallons based upon a rolling 12-month summation. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the mold release usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Mold Release Usage (gallons)</u>
1	165
1-2	330
2-3	495
3-4	660
4-5	825
5-6	990
6-7	1,150
7-8	1,320
8-9	1,485
9-10	1,650
10-11	1,815
11-12	1,980

After the first 12 calendar months of operation following issuance of this permit, compliance with the annual mold release usage limitation shall be based upon a rolling 12-month summation.

Dayco**PTI A****Issued: To be entered upon final issuance**Emissions Unit ID: **P008****C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information each month for emissions units P001, P003, P004, P005, P006, P007 and P008:
 - a. The company identification of each mold release, coating, and thinning solvent, as applied in each emissions unit.
 - b. The volume, in gallons, of each mold release, coating, and thinning solvent applied in each emissions unit.
 - c. The OC content of each mold release, coating, and thinning solvent, in pounds of OC per gallon, as applied.
 - d. The total OC emissions for all mold release, coatings, and thinning solvents applied, in tons per month from each emissions unit (the sum of $b \times c$ for each mold release, coating and thinning solvent divided by 2,000 lbs/ton).
 - e. The rolling, 12-month summation of the monthly OC emissions from emissions units P001, P003, P004, P005, P006, P007 and P008 (the sum of the monthly emissions rates calculated in d for the previous 12 months for each emissions unit).
2. The permittee shall collect and record the following information for the purpose of determining annual OC emissions from this emissions unit:
 - a. The total annual mold release use, in gallons.
 - b. The total annual OC emissions from all mold release use, in tons.
3. The permit to install for this emissions unit (P008) was evaluated based on the actual materials (typically coatings) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Dayton Polymeric Products
PTI Application: 08-04706
Issue

Facility ID: 0857043129

Emissions Unit ID: P008

Pollutant: hydrocarbon naphtha

TLV (mg/m3): 572,597 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 0.85 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 127 ug/m3

MAGLC (ug/m3): 5,726 ug/m3

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
 5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

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- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of:
 - a. All days when the OC content of the mold release used in this emissions unit shall not exceed 6.24 pounds of OC per gallon of mold release applied.
 - b. All exceedances of the rolling, 12-month mold release usage limitation and, for the first 12 calendar months of operation following issuance of this permit, all exceedances of the maximum allowable cumulative mold release usage levels.
 - c. All exceedances of the rolling 12-month OC emissions limitation from emissions units P001, P003, P004, P005, P006, P007, and P008.

The quarterly deviation (excursion) reports shall be submitted as specified in section A.2.b of the General Terms and Conditions.

2. The permittee shall submit annual reports to the Director (the appropriate Ohio EPA District Office or local air agency) for this emissions unit that specify:
 - a. The rolling 12 month mold release usage, in gallons.
 - b. The total OC emissions, in tons, from all mold release applied.

These reports shall be submitted by April 15 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emissions limitations in section A.I.1. of these terms and

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conditions shall be determined in accordance with the following methods:

a. Emission Limitation -

The OC emissions from this emissions unit shall not exceed 1.75 lbs/hour.

Applicable Compliance Method -

Compliance with the hourly allowable OC emission limitation may be determined by multiplying the maximum OC content of the mold release (lbs OC/gallon) by the maximum mold release usage rate (gallons/hr).

b. Emission Limitation:

The OC emissions from this emissions unit shall not exceed 6.18 TPY.

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.2 and shall be determined by summing the monthly usage, in gallons, of each mold release multiplied by its OC content, in pounds per gallon, for each year.

c. Emission Limitation:

The OC emissions from emissions units P001, P003, P004, P005, P006, P007 and P008 shall not exceed 78.8 TPY based upon a rolling, 12-month summation of the monthly OC emissions.

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.1. and shall be determined by the sum of the rolling, 12-month usage, in gallons, of each mold release, coating and thinning solvent multiplied by its OC content, in pounds per gallon.

F. Miscellaneous Requirements

1. Compliance with the rolling OC emission limitations in section A.1 and the monitoring, record keeping, reporting and testing requirements in sections C.1, D.1, and E.1.d for this emissions unit are federally enforceable.