

**Synthetic Minor Determination and/or**  **Netting Determination**

Permit To Install: **08-04880**

**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 modification of PTI 08-04706 (October, 2005) for the existing emissions units (P001, P003, P004, P005, P006, P007 and P008) to accommodate a change in mold release, a change in the record keeping requirements and also addresses the installation of a new emissions unit (P009).

**B. Facility Emissions and Attainment Status**

DPP is located in Montgomery County which is currently designated as 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 OC emissions to less than 75.8 TPY on a rolling 12-month basis.

**C. Source Emissions**

The potential emissions from each emissions unit are listed in the Table 1.

Table 1. Potential Air Emissions

EU	P001*	P004	P005	P006	P007	P008	P009	Total
OC = VOC (TPY)	7.30	26.4	40.1	33.9	25.9	7.76	17.5	172
Toluene (TPY)	5.12	0	0	0	0	0	0	5.12
Combined HAP (TPY)	5.12	0	0	0	0	0	0	5.12

\* Represents compliance with OAC rule 3745-21-07(G)(2).

DPP is potentially a major source of OC emissions as defined by Title V. DPP is not a major source of combined HAP or individual HAP emissions (5.1 TPY toluene accounts for all HAPs). Therefore, DPP has requested federally enforceable operating restrictions on OC usage to prevent triggering major source permitting requirements. A rolling 12-month emissions limitation of 75.8 TPY was established in PTI 08-04706 and DPP has not requested an increase in that emissions limit. Actual OC emissions from calendar year 2006 were 26.3 TPY.

**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 75.8 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.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL  
MONTGOMERY COUNTY**

**CERTIFIED MAIL**

Street Address:

Mailing Address:

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

Lazarus Gov.  
Center

**Application No:** 08-04880  
**Fac ID:** 0857043129

**DATE:** 10/30/2007

Dayton Polymeric Products  
Cathy Bassett  
3337 N Dixie Dr  
Dayton, OH 45414-5645

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, 43216-1049.

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 **\$1400** 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



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install  
Terms and Conditions**

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

**DRAFT PERMIT TO INSTALL 08-04880**

Application Number: 08-04880  
Facility ID: 0857043129  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Dayton Polymeric Products  
Person to Contact: Cathy Bassett  
Address: 3337 N Dixie Dr  
Dayton, OH 45414-5645

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

**3337 N Dixie Dr  
Dayton, Ohio**

Description of proposed emissions unit(s):

**Chapter 31 modification replacing PTI 08-04706 issued 10/20/05 for P001 only to increase paint usage which increases the hourly emissions rate and to install new foam line number 5.**

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

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Chris Korleski  
Director

Dayton Polymeric Products

PTI Application: 08-04880

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 (i.e., postmarked) quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

### **3. 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.

**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

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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

**Dayton Polymeric Products**

**Facility ID: 0857043129**

**PTI Application: 08-04880**

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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	75.8

**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.

**Operations, Property, and/or Equipment - (P001) - Energy Absorbing Foam Molding Line No. 6  
\* Modification**

<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
OAC rule 3745-31-05(A)(3)	The organic compound (OC) emissions from this emissions unit shall not exceed 8 lbs/hour, 40 lbs/day and 7.3 tons per year (TPY).
OAC rule 3745-31-05(C)	The OC emissions from emissions units P001, P004, P005, P006, P007, P008 and P009 shall not exceed 75.8 TPY based upon a rolling 12-month summation of monthly OC emissions rates
OAC rule 3745-21-07(G)(2)	The emissions limitations of this rule are equivalent to the limitations established according OAC rule 3745-31-05(A)(3).
OAC rule 3745-114-01	see section C.3. and 4. and D.3.

**2. Additional Terms and Conditions**

- 2.a None

**B. Operational Restrictions**

1. The weight of the organic compounds in the coatings, thinners and mold releases employed in emissions units P001, P004, P005, P006, P007, P008 and P009 shall not exceed 75.8 TPY based upon a rolling 12-month summation. The permittee has existing coating, thinner, and mold release usage records and therefore does not need to be limited in the first year on a monthly basis.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information for each day this emissions unit is in operation:
  - a. The company identification for each coating, thinner and mold release material

Emissions Unit ID: **P001**

- employed.
- b. The volume, in gallons, of each coating, thinner and mold release employed.
  - c. The organic compound content of each coating, thinner and mold release, in percent by weight.
  - d. The total organic compound emission rate for all coatings, thinners and mold releases, in pounds per day (the sum of b x c).
  - e. The total number of hours the emissions unit was in operation.
  - f. The average hourly organic compound emission rate for all coatings, thinners and mold releases, in pounds per hour (d/e).
2. The permittee shall collect and record the following information each month for emissions units P001, P003, P004, P005, P006, P007, P008 and P009:
- 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.
  - 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, P003, P004, P005, P006, P007, P008 and P009 (the sum of the monthly emissions rates calculated in d for the previous 12 months for each emissions unit).
3. The permit to install for this emissions unit P001 was evaluated based on the actual materials 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 to this emissions unit for each toxic pollutant, using data from the permit to install application,

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and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene

TLV (mg/m<sup>3</sup>): 18.8 mg/m<sup>3</sup>

Maximum Hourly Emission Rate (lbs/hr): 8 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 1008 ug/m<sup>3</sup>

MAGLC (ug/m<sup>3</sup>): 4,486 ug/m<sup>3</sup>

4. The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(b), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - 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.).

**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of:

Emissions Unit ID: **P001**

- a. an identification of each day during which the average hourly organic compound emissions from the coatings and thinners exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
- b. an identification of each day during which the organic compound emissions from the coatings and thinners exceeded 40 pounds per day, and the actual organic compound emissions for each such day. All exceedances of the rolling, 12-month coating, thinner and mold release usage limitation.
- c. All exceedances of the rolling, 12-month coating, thinner and mold release usage limitation.
- d. All exceedances of the rolling 12-month OC emissions limitation from emissions units P001, P003, P004, P005, P006, P007, P008 and P009.

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 volume, in gallons, of all coating, thinner and mold release used, in gallons.
  - b. The total OC emissions, in tons, from all coatings, thinner and mold release used.

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

3. The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 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 8 lbs/hour.

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Applicable Compliance Method:

Compliance shall be based upon record keeping as specified in C.1 and shall be determined by recording the daily coating, thinner and mold release usage, in gallons, multiplied by its OC content, in pounds per gallon, divided by the hours of operation, for each day.

b. Emission Limitation:

The OC emissions from this emissions unit shall not exceed 40 lbs/day.

Applicable Compliance Method:

Compliance shall be based upon record keeping as specified in C.1 and shall be determined by recording the daily coating, thinner and mold release usage, in gallons, multiplied by its OC content, in pounds per gallon, for each day.

c. Emission Limitation:

The OC emissions from this emissions unit shall not exceed 7.3 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, P004, P005, P006, P007, P008 and P009 shall not exceed 75.8 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.2. and shall be determined by the sum for the previous 12 months of the 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, the operational restrictions in section B and the monitoring, record keeping, reporting and testing requirements in sections C.1, C.2, D.1, and E.1.d for this emissions unit are federally

**Dayton Polymeric Products****PTI Application: 08-04880****Facility ID: 0857043129****Emissions Unit ID: P001**

enforceable.

2. This PTI is a modification of PTI 08-04566 (April, 2004) and subsequently 08-04706 (October, 2005) for this emissions unit to reflect the variable nature of the manufacturing operations in this emissions unit. The allowable OC emissions rate for this emissions unit was increased to 8 lbs/hour and 40 lbs/day to reflect compliance with OAC rule 3745-21-07(G)(2).

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**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.

**Operations, Property, and/or Equipment -(P004) - Energy Absorbing Foam Molding Line No. 1**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The organic compound (OC) emissions from this emissions unit shall not exceed 6.03 lbs/hour and 26.4 tons per year (TPY).
OAC rule 3745-31-05(C)	The combined OC emissions from emissions units P001, P004, P005, P006, P007, P008 and P009 shall not exceed 75.8 TPY based upon a rolling 12-month summation of monthly OC emissions rates
OAC rule 3745-21-07(G)(2)	See A.2.b and D.3.
OAC rule 3745-114-01	see section C.2. and 3. and D.4.

**2. Additional Terms and Conditions**

- 2.a The 6.03 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.
- 2.b This emissions unit does not currently use photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5). It is therefore, exempt from all emissions limitations and control requirements contained in OAC rule 3745-21-07(G)(2).

**B. Operational Restrictions**

1. The weight of the organic compounds in the coatings, thinners and mold releases employed in emissions units P001, P004, P005, P006, P007, P008 and P009 shall not exceed 75.8 TPY based upon a rolling 12-month summation. The permittee has existing coating, thinner, and mold release usage records and therefore does not need to be limited in the first year on a monthly basis.

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Emissions Unit ID: **P004**

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**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, P008 and P009:
  - 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.
  - 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, P003, P004, P005, P006, P007, P008 and P009 (the sum of the monthly emissions rates calculated in d for the previous 12 months for each emissions unit).
  
2. The permit to install for this emissions unit P004 was evaluated based on the actual materials 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Stoddard solvent

TLV ( $\text{mg}/\text{m}^3$ ): 573  $\text{mg}/\text{m}^3$

Maximum Hourly Emission Rate (lbs/hr): 6.03 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration ( $\text{ug}/\text{m}^3$ ): 2,002  $\text{ug}/\text{m}^3$

MAGLC ( $\text{ug}/\text{m}^3$ ): 13,633  $\text{ug}/\text{m}^3$

Emissions Unit ID: **P004**

3. The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(b), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - 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.).

#### **D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of:
  - a. All exceedances of the rolling, 12-month coating, thinner and mold release usage limitation.
  - b. All exceedances of the rolling 12-month OC emissions limitation from emissions units P001, P003, P004, P005, P006, P007, P008 and P009.

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 volume, in gallons, of mold release used in this emissions unit.

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- b. The total OC emissions, in tons, from all mold release used in this emissions unit.

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

- 3. Prior to employing any photochemically reactive material in this emissions unit, the permittee shall provide written notification to the Director (the appropriate District Office or local air agency). Such notification shall include information sufficient to determine compliance with the emission limits and/or control requirements specified in OAC rule 3745-21-07(G).
- 4. The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 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 6.03 lbs/hour.

Applicable Compliance Method:  
Compliance shall be based upon the maximum mold release usage rate (0.95 gallon/hour) by its maximum OC content (6.35 lbs/gallon).

- b. Emission Limitation:  
The OC emissions from this emissions unit shall not exceed 26.4 TPY.

Applicable Compliance Method:  
Compliance shall be based upon record keeping as specified in C.1 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.

- c. Emission Limitation:  
The OC emissions from emissions units P001, P004, P005, P006, P007, P008

Emissions Unit ID: **P004**

and P009 shall not exceed 75.8 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.2. and shall be determined by the sum for the previous 12 months of the 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, the operational restrictions in section B and the monitoring, record keeping, reporting and testing requirements in sections C.1, D.1, and E.1.c for this emissions unit are federally enforceable.
2. This PTI is a modification of PTI 08-04566 (April, 2004) and subsequently PTI 08-04706 (October, 2005) for this emissions unit for an increase hourly mold release usage. The allowable OC emissions rate for this emissions unit increased from 5.92 lbs/hour, and 15.0 TPY to 6.03 lbs/hour, and 26.4 TPY.

**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.

**Operations, Property, and/or Equipment - (P005) - Energy Absorbing Foam Molding Line No. 2  
\*Modification**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The organic compound (OC) emissions from this emissions unit shall not exceed 9.14 lbs/hour and 40.1 tons per year (TPY).
OAC rule 3745-31-05(C)	The combined OC emissions from emissions units P001, P004, P005, P006, P007, P008 and P009 shall not exceed 75.8 TPY based upon a rolling 12-month summation of monthly OC emissions rates
OAC rule 3745-21-07(G)(2)	See A.2.b and D.3.
OAC rule 3745-114-01	see section C.2. and 3. and D.4.

**2. Additional Terms and Conditions**

- 2.a The 9.14 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.
- 2.b This emissions unit does not currently use photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5). It is therefore, exempt from all emissions limitations and control requirements contained in OAC rule 3745-21-07(G)(2).

**B. Operational Restrictions**

1. The weight of the organic compounds in the coatings, thinners and mold releases employed in emissions units P001, P004, P005, P006, P007, P008 and P009 shall not exceed 75.8 TPY based upon a rolling 12-month summation. The permittee has existing coating, thinner, and mold release usage records and therefore does not need

Emissions Unit ID: P005

to be limited in the first year on a monthly basis.

### 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, P008 and P009:
  - 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.
  - 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, P003, P004, P005, P006, P007, P008 and P009 (the sum of the monthly emissions rates calculated in d for the previous 12 months for each emissions unit).
  
2. The permit to install for this emissions unit P005 was evaluated based on the actual materials 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Stoddard solvent

TLV (mg/m<sup>3</sup>): 573 mg/m<sup>3</sup>

Maximum Hourly Emission Rate (lbs/hr): 9.14 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 3,034 ug/m<sup>3</sup>

**Issued: To be entered upon final issuance**

MAGLC (ug/m<sup>3</sup>): 13,633 ug/m<sup>3</sup>

3. The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(b), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - 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.).

**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of:
  - a. All exceedances of the rolling, 12-month coating, thinner and mold release usage limitation.
  - b. All exceedances of the rolling 12-month OC emissions limitation from emissions units P001, P003, P004, P005, P006, P007, P008 and P009.

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:

Emissions Unit ID: **P005**

- a. The volume, in gallons, of mold release used in this emissions unit.
- b. The total OC emissions, in tons, from all mold release used in this emissions unit.

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

3. Prior to employing any photochemically reactive material in this emissions unit, the permittee shall provide written notification to the Director (the appropriate District Office or local air agency). Such notification shall include information sufficient to determine compliance with the emission limits and/or control requirements specified in OAC rule 3745-21-07(G).
4. The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 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 9.14 lbs/hour.  
  
Applicable Compliance Method:  
Compliance shall be based upon the maximum mold release usage rate (1.44 gallon/hour) by its maximum OC content (6.35 lbs/gallon).
  - b. Emission Limitation:  
The OC emissions from this emissions unit shall not exceed 40.1 TPY.  
  
Applicable Compliance Method:  
Compliance shall be based upon record keeping as specified in C.1 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.

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c. Emission Limitation:

The OC emissions from emissions units P001, P004, P005, P006, P007, P008 and P009 shall not exceed 75.8 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.2. and shall be determined by the sum for the previous 12 months of the 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, the operational restrictions in section B and the monitoring, record keeping, reporting and testing requirements in sections C.1, D.1, and E.1.c for this emissions unit are federally enforceable.
2. This PTI is a modification of PTI 08-04566 (April, 2004) and subsequently PTI 08-04706 (October, 2005) for this emissions unit for an increase hourly mold release usage. The allowable OC emissions rate for this emissions unit increased from 8.98 lbs/hour, and 15.0 TPY to 9.14 lbs/hour, and 40.1 TPY.

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**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.

**Operations, Property, and/or Equipment -(P006) - Energy Absorbing Foam Molding Line No. 8**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The organic compound (OC) emissions from this emissions unit shall not exceed 7.75 lbs/hour and 33.9 tons per year (TPY).
OAC rule 3745-31-05(C)	The combined OC emissions from emissions units P001, P004, P005, P006, P007, P008 and P009 shall not exceed 75.8 TPY based upon a rolling 12-month summation of monthly OC emissions rates
OAC rule 3745-21-07(G)(2)	See A.2.b and D.3.
OAC rule 3745-114-01	see section C.2. and 3. and D.4.

**2. Additional Terms and Conditions**

- 2.a The 7.75 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.
- 2.b This emissions unit does not currently use photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5). It is therefore, exempt from all emissions limitations and control requirements contained in OAC rule 3745-21-07(G)(2).

**B. Operational Restrictions**

1. The weight of the organic compounds in the coatings, thinners and mold releases employed in emissions units P001, P004, P005, P006, P007, P008 and P009 shall not exceed 75.8 TPY based upon a rolling 12-month summation. The permittee has existing coating, thinner, and mold release usage records and therefore does not need to be limited in the first year on a monthly basis.

**Dayton Polymeric Products**  
DTI Application: 08-04880

**Facility ID: 0857043129**

**Emissions Unit ID: P006**

**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, P008 and P009:
  - 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.
  - 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, P003, P004, P005, P006, P007, P008 and P009 (the sum of the monthly emissions rates calculated in d for the previous 12 months for each emissions unit).
  
2. The permit to install for this emissions unit P006 was evaluated based on the actual materials 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Stoddard solvent

TLV (mg/m<sup>3</sup>): 573 mg/m<sup>3</sup>

Maximum Hourly Emission Rate (lbs/hr): 7.75 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 574 ug/m<sup>3</sup>

MAGLC (ug/m<sup>3</sup>): 13,633 ug/m<sup>3</sup>

**Issued: To be entered upon final issuance**

3. The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(b), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - 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.).

**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of:
  - a. All exceedances of the rolling, 12-month coating, thinner and mold release usage limitation.
  - b. All exceedances of the rolling 12-month OC emissions limitation from emissions units P001, P003, P004, P005, P006, P007, P008 and P009.

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 volume, in gallons, of mold release used in this emissions unit.

Emissions Unit ID: P006

- b. The total OC emissions, in tons, from all mold release used in this emissions unit.

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

3. Prior to employing any photochemically reactive material in this emissions unit, the permittee shall provide written notification to the Director (the appropriate District Office or local air agency). Such notification shall include information sufficient to determine compliance with the emission limits and/or control requirements specified in OAC rule 3745-21-07(G).
4. The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 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 7.75 lbs/hour.  
  
Applicable Compliance Method:  
Compliance shall be based upon the maximum mold release usage rate (1.22 gallon/hour) by its maximum OC content (6.35 lbs/gallon).
  - b. Emission Limitation:  
The OC emissions from this emissions unit shall not exceed 33.9 TPY.  
  
Applicable Compliance Method:  
Compliance shall be based upon record keeping as specified in C.1 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.
  - c. Emission Limitation:  
The OC emissions from emissions units P001, P004, P005, P006, P007, P008

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and P009 shall not exceed 75.8 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 for the previous 12 months of the 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, the operational restrictions in section B and the monitoring, record keeping, reporting and testing requirements in sections C.1, D.1, and E.1.c for this emissions unit are federally enforceable.
2. This PTI is a modification of PTI 08-04566 (April, 2004) and subsequently PTI 08-04706 (October, 2005) for this emissions unit for an increase hourly mold release usage. The allowable OC emissions rate for this emissions unit increased from 7.61 lbs/hour, and 15.0 TPY to 7.75 lbs/hour, and 33.9 TPY.

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. Applicable Emissions Limitations and/or Control Requirements**

- The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

**Operations, Property, and/or Equipment -(P007) - Energy Absorbing Foam Molding Line No. 3  
\*Modification**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The organic compound (OC) emissions from this emissions unit shall not exceed 5.91 lbs/hour and 25.9 tons per year (TPY).
OAC rule 3745-31-05(C)	The combined OC emissions from emissions units P001, P004, P005, P006, P007, P008 and P009 shall not exceed 75.8 TPY based upon a rolling 12-month summation of monthly OC emissions rates
OAC rule 3745-21-07(G)(2)	See A.2.b and D.3.
OAC rule 3745-114-01	see section C.2. and 3. and D.4.

**2. Additional Terms and Conditions**

- The 5.91 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.
- This emissions unit does not currently use photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5). It is therefore, exempt from all emissions limitations and control requirements contained in OAC rule 3745-21-07(G)(2).

**B. Operational Restrictions**

- The weight of the organic compounds in the coatings, thinners and mold releases employed in emissions units P001, P004, P005, P006, P007, P008 and P009 shall not exceed 75.8 TPY based upon a rolling 12-month summation. The permittee has existing coating, thinner, and mold release usage records and therefore does not need to be limited in the first year on a monthly basis.

**Issued: To be entered upon final issuance**

**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, P008 and P009:
  - 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.
  - 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, P003, P004, P005, P006, P007, P008 and P009 (the sum of the monthly emissions rates calculated in d for the previous 12 months for each emissions unit).
2. The permit to install for this emissions unit P007 was evaluated based on the actual materials 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Stoddard solvent

TLV (mg/m<sup>3</sup>): 573 mg/m<sup>3</sup>

Maximum Hourly Emission Rate (lbs/hr): 5.91 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 1,962 ug/m<sup>3</sup>

MAGLC (ug/m<sup>3</sup>): 13,633 ug/m<sup>3</sup>

Emissions Unit ID: P007

3. The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(b), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - 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.).

#### D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of:
  - a. All exceedances of the rolling, 12-month coating, thinner and mold release usage limitation.
  - b. All exceedances of the rolling 12-month OC emissions limitation from emissions units P001, P003, P004, P005, P006, P007, P008 and P009.

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:

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- a. The volume, in gallons, of mold release used in this emissions unit.
- b. The total OC emissions, in tons, from all mold release used in this emissions unit.

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

3. Prior to employing any photochemically reactive material in this emissions unit, the permittee shall provide written notification to the Director (the appropriate District Office or local air agency). Such notification shall include information sufficient to determine compliance with the emission limits and/or control requirements specified in OAC rule 3745-21-07(G).
4. The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 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 5.91 lbs/hour.  
  
Applicable Compliance Method:  
Compliance shall be based upon the maximum mold release usage rate (0.93 gallon/hour) by its maximum OC content (6.35 lbs/gallon).
  - b. Emission Limitation:  
The OC emissions from this emissions unit shall not exceed 25.9 TPY.  
  
Applicable Compliance Method:  
Compliance shall be based upon record keeping as specified in C.1 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.
  - c. Emission Limitation:

Emissions Unit ID: **P007**

The OC emissions from emissions units P001, P004, P005, P006, P007, P008 and P009 shall not exceed 75.8 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 for the previous 12 months of the 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, the operational restrictions in section B and the monitoring, record keeping, reporting and testing requirements in sections C.1, D.1, and E.1.c for this emissions unit are federally enforceable.
2. This PTI is a modification of PTI 08-04566 (April, 2004) and subsequently PTI 08-04706 (October, 2005) for this emissions unit for an increase hourly mold release usage. The allowable OC emissions rate for this emissions unit increased from 5.80 lbs/hour, and 15.0 TPY to 5.91 lbs/hour, and 25.9 TPY.

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.

**Operations, Property, and/or Equipment -(P008) - Energy Absorbing Foam Molding Line No. 9**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The organic compound (OC) emissions from this emissions unit shall not exceed 1.77 lbs/hour and 7.76 tons per year (TPY).
OAC rule 3745-31-05(C)	The combined OC emissions from emissions units P001, P004, P005, P006, P007, P008 and P009 shall not exceed 75.8 TPY based upon a rolling 12-month summation of monthly OC emissions rates
OAC rule 3745-21-07(G)(2)	See A.2.b and D.3.
OAC rule 3745-114-01	see section C.2. and 3. and D.4.

**2. Additional Terms and Conditions**

- 2.a The 1.77 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.
- 2.b This emissions unit does not currently use photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5). It is therefore, exempt from all emissions limitations and control requirements contained in OAC rule 3745-21-07(G)(2).

**B. Operational Restrictions**

1. The weight of the organic compounds in the coatings, thinners and mold releases employed in emissions units P001, P004, P005, P006, P007, P008 and P009 shall not exceed 75.8 TPY based upon a rolling 12-month summation. The permittee has existing coating, thinner, and mold release usage records and therefore does not need to be limited in the first year on a monthly basis.

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Emissions Unit ID: **P008**

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**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, P008 and P009:
  - 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.
  - 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, P003, P004, P005, P006, P007, P008 and P009 (the sum of the monthly emissions rates calculated in d for the previous 12 months for each emissions unit).
  
2. The permit to install for this emissions unit P008 was evaluated based on the actual materials 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Stoddard solvent

TLV (mg/m<sup>3</sup>): 573 mg/m<sup>3</sup>

Maximum Hourly Emission Rate (lbs/hr): 1.77 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 2,795 ug/m<sup>3</sup>

MAGLC (ug/m<sup>3</sup>): 13,633 ug/m<sup>3</sup>

Emissions Unit ID: **P008**

3. The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(b), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - 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.).

#### **D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of:
  - a. All exceedances of the rolling, 12-month coating, thinner and mold release usage limitation.
  - b. All exceedances of the rolling 12-month OC emissions limitation from emissions units P001, P003, P004, P005, P006, P007, P008 and P009.

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 volume, in gallons, of mold release used in this emissions unit.

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- b. The total OC emissions, in tons, from all mold release used in this emissions unit.

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

- 3. Prior to employing any photochemically reactive material in this emissions unit, the permittee shall provide written notification to the Director (the appropriate District Office or local air agency). Such notification shall include information sufficient to determine compliance with the emission limits and/or control requirements specified in OAC rule 3745-21-07(G).
- 4. The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 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 1.77 lbs/hour.

Applicable Compliance Method:  
Compliance shall be based upon the maximum mold release usage rate (0.28 gallon/hour) by its maximum OC content (6.35 lbs/gallon).

- b. Emission Limitation:  
The OC emissions from this emissions unit shall not exceed 7.76 TPY.

Applicable Compliance Method:  
Compliance shall be based upon record keeping as specified in C.1 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.

- c. Emission Limitation:  
The OC emissions from emissions units P001, P004, P005, P006, P007, P008

Emissions Unit ID: **P008**

and P009 shall not exceed 75.8 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 for the previous 12 months of the 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, the operational restrictions in section B and the monitoring, record keeping, reporting and testing requirements in sections C.1, D.1, and E.1.c for this emissions unit are federally enforceable.
2. This PTI is a modification of PTI 08-04566 (April, 2004) and subsequently PTI 08-04706 (October, 2005) for this emissions unit for an increase hourly mold release usage. The allowable OC emissions rate for this emissions unit increased from 1.75 lbs/hour, and 6.18 TPY to 1.77 lbs/hour, and 7.76 TPY.

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**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.

**Operations, Property, and/or Equipment -(P009) - Energy Absorbing Foam Molding Line No. 5**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The organic compound (OC) emissions from this emissions unit shall not exceed 4.00 lbs/hour and 17.5 tons per year (TPY).
OAC rule 3745-31-05(C)	The combined OC emissions from emissions units P001, P004, P005, P006, P007, P008 and P009 shall not exceed 75.8 TPY based upon a rolling 12-month summation of monthly OC emissions rates
OAC rule 3745-21-07(G)(2)	See A.2.b and D.3.
OAC rule 3745-114-01	see section C.2. and 3. and D.4.

**2. Additional Terms and Conditions**

- 2.a The 4.00 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.
- 2.b This emissions unit does not currently use photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5). It is therefore, exempt from all emissions limitations and control requirements contained in OAC rule 3745-21-07(G)(2).

**B. Operational Restrictions**

1. The weight of the organic compounds in the coatings, thinners and mold releases employed in emissions units P001, P004, P005, P006, P007, P008 and P009 shall not exceed 75.8 TPY based upon a rolling 12-month summation. The permittee has existing coating, thinner, and mold release usage records and therefore does not need to be limited in the first year on a monthly basis.

**Dayton Polymeric Products**  
DTI Application: 08-04880

**Facility ID: 0857043129**

**Emissions Unit ID: P009**

**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, P008 and P009:
  - 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.
  - 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, P003, P004, P005, P006, P007, P008 and P009 (the sum of the monthly emissions rates calculated in d for the previous 12 months for each emissions unit).
2. The permit to install for this emissions unit P009 was evaluated based on the actual materials 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Stoddard solvent

TLV (mg/m<sup>3</sup>): 573 mg/m<sup>3</sup>

Maximum Hourly Emission Rate (lbs/hr): 4.00 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 6,316 ug/m<sup>3</sup>

MAGLC (ug/m<sup>3</sup>): 13,633 ug/m<sup>3</sup>

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3. The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(b), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - 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.).

**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of:
  - a. All exceedances of the rolling, 12-month coating, thinner and mold release usage limitation.
  - b. All exceedances of the rolling 12-month OC emissions limitation from emissions units P001, P003, P004, P005, P006, P007, P008 and P009.

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 volume, in gallons, of mold release used in this emissions unit.

Emissions Unit ID: P009

- b. The total OC emissions, in tons, from all mold release used in this emissions unit.

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

3. Prior to employing any photochemically reactive material in this emissions unit, the permittee shall provide written notification to the Director (the appropriate District Office or local air agency). Such notification shall include information sufficient to determine compliance with the emission limits and/or control requirements specified in OAC rule 3745-21-07(G).
4. The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 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 4.0 lbs/hour.  
  
Applicable Compliance Method:  
Compliance shall be based upon the maximum mold release usage rate (0.63 gallon/hour) by its maximum OC content (6.35 lbs/gallon).
  - b. Emission Limitation:  
The OC emissions from this emissions unit shall not exceed 17.5 TPY.  
  
Applicable Compliance Method:  
Compliance shall be based upon record keeping as specified in C.1 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.
  - c. Emission Limitation:  
The OC emissions from emissions units P001, P004, P005, P006, P007, P008

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and P009 shall not exceed 75.8 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 for the previous 12 months of the 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, the operational restrictions in section B and the monitoring, record keeping, reporting and testing requirements in sections C.1, D.1, and E.1.c for this emissions unit are federally enforceable.