

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

Permit To Install **08-04055**

Rubber Seal

- A. Source Description: This facility is a manufacturer of coatings. Emissions units P001 through P004 are clear coating mixers, P005 and P006 manufacture primers, P007 is an undercoat mixer, P008 is an intermediate mixer, and emissions unit P009 is the tank cleanup operations.
- B. Facility Emissions and Attainment Status: Rubber Seal is located in Montgomery County, which is currently designated as attainment for all pollutants. Rubber Seal has potential HAP emissions greater than the major source thresholds for individual and total combined HAPs.
- C. Source Emissions: Potential HAP emissions are 24.09 TPY toluene, 10.9 TPY xylene, and 37.26 TPY total combined HAPs. In order to restrict potential HAP emissions, the permittee has accepted a facility wide limitation of 9.9 tons of any individual HAP, as a rolling, 12-month summation and 24.9 tons of total HAPs, as a rolling, 12-month summation, from all emissions units at the facility. To ensure enforceability during the first twelve months of operation following issuance of this permit, cumulative emission limitations have been established for individual HAPs and total combined HAPs. After the first twelve months of operation following issuance of this permit, the HAP emission rates shall demonstrate compliance on a rolling, 12-month basis. In order to demonstrate compliance with these limitations, the permittee shall maintain monthly records of the individual HAP emission rates for each HAP as well as the total HAP emission rates from all emissions units at the facility. Quarterly deviation reports shall be submitted to identify any exceedances of the HAP emission limitations as well as annual reports of the HAP emissions for the calendar year.
- D. Conclusion: The monthly records of the HAP emissions, for each individual HAP and for the total combined HAPs, will ensure compliance with facility wide HAP emission limitations ensuring that potential HAP emissions are less than the major source thresholds.



State of Ohio Environmental Protection Agency

Street Address:

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

Mailing Address:

Lazarus Gov.  
Center

**RE: DRAFT PERMIT TO INSTALL  
MONTGOMERY COUNTY  
Application No: 08-04055**

**CERTIFIED MAIL**

**DATE: 1/30/2001**

Rubber Seal  
Shannon Alvis  
5751 N Webster St  
Dayton, OH 45414-0000

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 **\$4400** 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.

Very truly yours,

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

CC: USEPA      RAPCA      KY      IN      Miami Valley Reg Plan Com



**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 08-04055**

Application Number: 08-04055  
APS Premise Number: 0857733184  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Rubber Seal  
Person to Contact: Shannon Alvis  
Address: 5751 N Webster St  
Dayton, OH 45414-0000

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**5751 N Webster St  
Dayton, Ohio**

Description of proposed emissions unit(s):  
**coating mixers/filling stations and cleanup operations.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

---

Director

**Part I - GENERAL TERMS AND CONDITIONS**

**A. Permit to Install General Terms and Conditions**

**1. Compliance Requirements**

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

**2. Reporting Requirements Related to Monitoring and Recordkeeping 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, 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

**Rubber Seal**

**Facility ID: 0857733184**

**PTI Application: 08-04055**

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

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 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

**Rubber Seal**

**Facility ID: 0857733184**

**PTI Application: 08-04055**

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

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

**Rubber Seal**

**Facility ID: 0857733184**

**PTI Application: 08-04055**

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

facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate 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 prove to be inadequate 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 application must be made to the Director for the installation or modification of any other emissions unit(s).

**12. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

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

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new

**Rubber Seal**

**Facility ID: 0857733184**

**PTI Application: 08-04055**

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

or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

**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	52.02
individual HAPs	9.9
total combined HAPs	24.9

**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 - 400 gallon clear coat mixer No. 1 with filling station	OAC rule 3745-31-05(A)(3)	1.0 lb/hour and 24 lbs/day organic compounds (OC)
		4.38 TPY OC
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07.
	OAC rule 3745-35-07 Federally enforceable limitations to avoid Title V.	Combined annual emissions from all emissions units at the facility shall not exceed 9.9 tons of any individual hazardous air pollutant (HAP), as a rolling, 12-month summation.
	OAC rule 3745-21-07(G)(2)	Combined annual emissions from all emissions units at the facility shall not exceed 24.9 tons of all HAPs, as a rolling, 12-month summation.
		The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule

3745-31-05(A)(3).

**2. Additional Terms and Conditions**

- 2.a** The 1.0 lb OC/hour emission limitation is being developed 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 limit.
- 2.b** To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table for the total combined emissions from all emissions units at the facility:

Month	Individual HAP Limit	Total Combined HAPs Limit
1	0.9 tons	2.25 tons
1 - 2	1.8 tons	4.50 tons
1 - 3	2.7 tons	6.75 tons
1 - 4	3.6 tons	9.00 tons
1 - 5	4.5 tons	11.25 tons
1 - 6	5.4 tons	13.50 tons
1 - 7	6.3 tons	15.75 tons
1 - 8	7.2 tons	18.00 tons
1 - 9	8.1 tons	20.25 tons
1 - 10	9.0 tons	22.50 tons
1 - 11	9.9 tons	24.75 tons
1 - 12	9.9 tons	24.90 tons

After the first 12 calendar months of operation following the issuance of this permit, compliance with the facility-wide HAP emission limitations shall be based upon rolling, 12-month summations of the monthly emissions, in tons.

**B. Operational Restrictions**

None

**C. Monitoring and/or Recordkeeping Requirements**

- 1. The permittee shall collect and record the following information each month for this coating mixer:
  - a. The company identification for each coating produced.

**Rubber Seal**

PTI / 08 04055

**Issue**

**Facility ID: 0857733184**

Emissions Unit ID: **P001**

- b. The number of gallons of each coating produced.
- c. The organic compound content of each coating produced, in pounds per gallon.
- d. The total organic compound emission rate for all coatings produced, in pounds per month calculated by multiplying the number of gallons of each coating produced by its respective organic compound content and the facility determined mass balance loss factor of 0.2%.
- e. The total number of days this coating mixer was in operation for the month.
- f. The average daily organic compound emission rate, in pounds per day (i.e., (d)/(e)).

**Rubt**

**PTI /**

Emissions Unit ID: **P001**

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

2. The permittee shall collect and record the following information each month for the entire facility (including, but not limited to emissions units P001, P002, P003, P004, P005, P006, P007, P008, and P009):
  - a. The name and identification number of each coating, primer, undercoat, and intermediate produced.
  - b. The individual HAP\* content for each HAP of each coating, primer, undercoat, and intermediate produced, in pounds of individual HAP per gallon of coating.
  - c. The number of gallons of each coating, primer, undercoat, and intermediate produced.
  - d. The name and identification of each cleanup material employed.
  - e. The individual HAP\* content for each HAP of each cleanup material, in pounds of individual HAP per gallon of material.
  - f. The number of gallons of each cleanup material employed.
  - g. The number of gallons of cleanup material recovered for disposal.
  - h. The total individual HAP emissions for each HAP from all coatings, primers, undercoats, intermediates, and cleanup materials, in tons per month. (i.e., the sum of [(C.2.b.) x (C.2.c.) x (appropriate loss factor)] + [(C.2.e.) x (C.2.f. - C.2.g.) x (0.04)] for each individual HAP, divided by 2,000 lbs/ton.)
  - i. During the first 12 calendar months of operation following issuance of this permit, the cumulative total of individual HAP emissions from all emissions units at the facility, in tons.  
After the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the total individual HAP emissions from all emissions units at the facility, in tons.
  - j. The total combined HAP emissions from all coatings, primers, undercoats, intermediates, and cleanup materials, in tons per month (i.e., sum of individual HAP emissions from all coatings, primers, undercoats, intermediates, and cleanup materials as determined in C.2.h).
  - k. During the first 12 calendar months of operation following issuance of this permit, the

**Rubt**

**PTI /**

Emissions Unit ID: **P001**

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

cumulative total combined HAP emissions from all emissions units at the facility, in tons.  
After the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the total combined HAP emissions from all emissions units at the facility, in tons.

\*A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA district office or local air agency contact. This information does not have to be kept on a line-by-line basis.

3. The permit to install for this emissions unit (P001) was evaluated based on the actual materials (typically coatings and cleanup 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 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: 2-diethylaminoethanol

TLV (mg/m<sup>3</sup>): 9.6

Maximum Hourly Emission Rate (lbs/hr): 0.02

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 3.857

MAGLC (ug/m<sup>3</sup>): 228.6

Pollutant: styrene

TLV (mg/m<sup>3</sup>): 85

Maximum Hourly Emission Rate (lbs/hr): 0.17

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 33.17

MAGLC (ug/m<sup>3</sup>): 2023



**Rubt**

**PTI**

Emissions Unit ID: **P001**

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

- 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 which include the following information:
  - a. An identification of each month during which the average daily organic compound emissions from the coatings exceeded 24 pounds per day, and the actual organic compound emissions for each such day.
  - b. An identification of all exceedances of the rolling, 12-month individual HAP emission limitation, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations specified in Section A.2.b of these terms and conditions.
  - c. An identification of all exceedances of the rolling, 12-month total combined HAPs emission limitation, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations specified in Section A.2.b of these terms and conditions.

These deviation reports shall be submitted in accordance with Part 1, General Condition 2 of these terms and conditions.

2. The permittee shall submit annual reports which specify the total organic compound emissions, in tons, from this emissions unit. The permittee shall also submit annual reports which specify the individual HAP and total combined HAP emissions, in tons, from all emissions units at the facility. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

#### **E. Testing Requirements**

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation -  
  
1.0 lb OC/hour  
  
Applicable Compliance Method -  
  
Compliance shall be determined by multiplying the maximum batch capacity of this emissions unit by the maximum organic compound content of all coatings mixed and the facility determined mass balance loss factor of 0.2%, divided by the number of hours in a batch.
  - b. Emission Limitation -  
  
24 lbs OC/day  
  
Applicable Compliance Method -  
  
Compliance shall be based upon record keeping as specified in C.1.
  - c. Emission Limitation -  
  
4.38 TPY OC

**Rubt**

**PTI /**

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

Emissions Unit ID: **P001**

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.1. and shall be the sum of the monthly organic compound emission rates for the calendar year, divided by 2,000 pounds per ton.

d. Emission Limitation -

9.9 TPY any individual HAP from all emissions units at the facility, as a rolling, 12-month summation

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.2.

e. Emission Limitation -

24.9 TPY total combined HAPs from all emissions units at the facility, as a rolling, 12-month summation

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.2.

**F. Miscellaneous Requirements**

None

Rubt

PTI /

Emissions Unit ID: P002

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>
P002 - 400 gallon clear coat mixer No. 2 with filling station	OAC rule 3745-31-05(A)(3)  OAC rule 3745-35-07 Federally enforceable limitations to avoid Title V.  OAC rule 3745-21-07(G)(2)	1.0 lb/hour and 24 lbs/day organic compounds (OC)  4.38 TPY OC  The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07.  Combined annual emissions from all emissions units at the facility shall not exceed 9.9 tons of any individual hazardous air pollutant (HAP), as a rolling, 12-month summation.  Combined annual emissions from all emissions units at the facility shall not exceed 24.9 tons of all HAPs, as a rolling, 12-month summation.  The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule

**Rubber Seal**  
**PTI**  
**Issue**

**Facility ID: 0857733184**

Emissions Unit ID: **P002**

3745-31-05(A)(3).

Rubt

PTI /

Emissions Unit ID: **P002**

Issued: To be entered upon final issuance

**2. Additional Terms and Conditions**

**2.a** The 1.0 lb OC/hour emission limitation is being developed 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 limit.

**2.b** To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table for the total combined emissions from all emissions units at the facility:

Month	Individual HAP Limit	Total Combined HAPs Limit
1	0.9 tons	2.25 tons
1 - 2	1.8 tons	4.50 tons
1 - 3	2.7 tons	6.75 tons
1 - 4	3.6 tons	9.00 tons
1 - 5	4.5 tons	11.25 tons
1 - 6	5.4 tons	13.50 tons
1 - 7	6.3 tons	15.75 tons
1 - 8	7.2 tons	18.00 tons
1 - 9	8.1 tons	20.25 tons
1 - 10	9.0 tons	22.50 tons
1 - 11	9.9 tons	24.75 tons
1 - 12	9.9 tons	24.90 tons

After the first 12 calendar months of operation following the issuance of this permit, compliance with the facility-wide HAP emission limitations shall be based upon rolling, 12-month summations of the monthly emissions, in tons.

**B. Operational Restrictions**

None

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each month for this coating mixer:
  - a. The company identification for each coating produced.
  - b. The number of gallons of each coating produced.

**Rubt**

**PTI**

Emissions Unit ID: **P002**

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

- c. The organic compound content of each coating produced, in pounds per gallon.
  - d. The total organic compound emission rate for all coatings produced, in pounds per month calculated by multiplying the number of gallons of each coating produced by its respective organic compound content and the facility determined mass balance loss factor of 0.2%.
  - e. The total number of days this coating mixer was in operation for the month.
  - f. The average daily organic compound emission rate, in pounds per day (i.e., (d)/(e)).
2. The permittee shall collect and record the following information each month for the entire facility (including, but not limited to emissions units P001, P002, P003, P004, P005, P006, P007, P008, and P009):
- a. The name and identification number of each coating, primer, undercoat, and intermediate produced.
  - b. The individual HAP\* content for each HAP of each coating, primer, undercoat, and intermediate produced, in pounds of individual HAP per gallon of coating.
  - c. The number of gallons of each coating, primer, undercoat, and intermediate produced.
  - d. The name and identification of each cleanup material employed.
  - e. The individual HAP\* content for each HAP of each cleanup material, in pounds of individual HAP per gallon of material.
  - f. The number of gallons of each cleanup material employed.
  - g. The number of gallons of cleanup material recovered for disposal.
  - h. The total individual HAP emissions for each HAP from all coatings, primers, undercoats, intermediates, and cleanup materials, in tons per month. (i.e., the sum of [(C.2.b.) x (C.2.c.) x (appropriate loss factor)] + [(C.2.e.) x (C.2.f. - C.2.g.) x (0.04)] for each individual HAP, divided by 2,000 lbs/ton.)
  - i. During the first 12 calendar months of operation following issuance of this permit, the cumulative total of individual HAP emissions from all emissions units at the facility, in tons. After the first 12 calendar months of operation following the issuance of this permit,

**Rubt**

**PTI**

Emissions Unit ID: **P002**

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

the rolling, 12-month summation of the total individual HAP emissions from all emissions units at the facility, in tons.

- j. The total combined HAP emissions from all coatings, primers, undercoats, intermediates, and cleanup materials, in tons per month (i.e., sum of individual HAP emissions from all coatings, primers, undercoats, intermediates, and cleanup materials as determined in C.2.h).
- k. During the first 12 calendar months of operation following issuance of this permit, the cumulative total combined HAP emissions from all emissions units at the facility, in tons. After the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the total combined HAP emissions from all emissions units at the facility, in tons.

\*A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA district office or local air agency contact. This information does not have to be kept on a line-by-line basis.

- 3. The permit to install for this emissions unit (P002) was evaluated based on the actual materials (typically coatings and cleanup 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 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: 2-diethylaminoethanol

TLV (mg/m3): 9.6

Maximum Hourly Emission Rate (lbs/hr): 0.02

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3.857

MAGLC (ug/m3): 228.6

Pollutant: styrene

**Rubber Seal**

PTI Application 08 01055

**Issue**

**Facility ID: 0857733184**

Emissions Unit ID: **P002**

TLV (mg/m3): 85

Maximum Hourly Emission Rate (lbs/hr): 0.17

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 33.17

MAGLC (ug/m3): 2023

Pollutant: toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 12.27

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2387

MAGLC (ug/m3): 4476

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 still 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.).

**Rubt**

**PTI /**

Emissions Unit ID: **P002**

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

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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

4. 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 which include the following information:

- a. An identification of each month during which the average daily organic compound emissions from the coatings exceeded 24 pounds per day, and the actual organic compound emissions for each such day.
- b. An identification of all exceedances of the rolling, 12-month individual HAP emission limitation, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations specified in Section A.2.b of these terms and conditions.
- c. An identification of all exceedances of the rolling, 12-month total combined HAPs emission limitation, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations specified in Section A.2.b of these terms and conditions.

These deviation reports shall be submitted in accordance with Part 1, General Condition 2 of these terms and conditions.

2. The permittee shall submit annual reports which specify the organic compound emissions, in tons, from this emissions unit. The permittee shall also submit annual reports which specify the individual HAP and total combined HAP emissions, in tons, from all emissions units at the facility. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

## E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation -  
  
1.0 lb OC/hour  
  
Applicable Compliance Method -  
  
Compliance shall be determined by multiplying the maximum batch capacity of this emissions unit by the maximum organic compound content of all coatings mixed and the facility determined mass balance loss factor of 0.2%, divided by the number of hours in a batch.
  - b. Emission Limitation -

**Rubt**

**PTI /**

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

Emissions Unit ID: **P002**

24 lbs OC/day

Applicable Compliance Method -

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

c. Emission Limitation -

4.38 TPY OC

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.1. and shall be the sum of the monthly organic compound emission rates for the calendar year, divided by 2,000 pounds per ton.

d. Emission Limitation -

9.9 TPY any individual HAP from all emissions units at the facility, as a rolling, 12-month summation

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.2.

e. Emission Limitation -

24.9 TPY total combined HAPs from all emissions units at the facility, as a rolling, 12-month summation

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.2.

**F. Miscellaneous Requirements**

None



**Rubber Seal**  
**PTI**  
**Issue**

**Facility ID: 0857733184**

Emissions Unit ID: **P003**

3745-31-05(A)(3).

Rubt

PTI /

Emissions Unit ID: P003

Issued: To be entered upon final issuance

**2. Additional Terms and Conditions**

**2.a** The 1.0 lb OC/hour emission limitation is being developed 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 limit.

**2.b** To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table for the total combined emissions from all emissions units at the facility:

Month	Individual HAP Limit	Total Combined HAPs Limit
1	0.9 tons	2.25 tons
1 - 2	1.8 tons	4.50 tons
1 - 3	2.7 tons	6.75 tons
1 - 4	3.6 tons	9.00 tons
1 - 5	4.5 tons	11.25 tons
1 - 6	5.4 tons	13.50 tons
1 - 7	6.3 tons	15.75 tons
1 - 8	7.2 tons	18.00 tons
1 - 9	8.1 tons	20.25 tons
1 - 10	9.0 tons	22.50 tons
1 - 11	9.9 tons	24.75 tons
1 - 12	9.9 tons	24.90 tons

After the first 12 calendar months of operation following the issuance of this permit, compliance with the facility-wide HAP emission limitations shall be based upon rolling, 12-month summations of the monthly emissions, in tons.

**B. Operational Restrictions**

None

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each month for this coating mixer:
  - a. The company identification for each coating produced.
  - b. The number of gallons of each coating produced.

**Rubt**

**PTI /**

Emissions Unit ID: **P003**

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

- c. The organic compound content of each coating produced, in pounds per gallon.
  - d. The total organic compound emission rate for all coatings produced, in pounds per month calculated by multiplying the number of gallons of each coating produced by its respective organic compound content and the facility determined mass balance loss factor of 0.2%.
  - e. The total number of days this coating mixer was in operation for the month.
  - f. The average daily organic compound emission rate, in pounds per day (i.e., (d)/(e)).
2. The permittee shall collect and record the following information each month for the entire facility (including, but not limited to emissions units P001, P002, P003, P004, P005, P006, P007, P008, and P009):
- a. The name and identification number of each coating, primer, undercoat, and intermediate produced.
  - b. The individual HAP\* content for each HAP of each coating, primer, undercoat, and intermediate produced, in pounds of individual HAP per gallon of coating.
  - c. The number of gallons of each coating, primer, undercoat, and intermediate produced.
  - d. The name and identification of each cleanup material employed.
  - e. The individual HAP\* content for each HAP of each cleanup material, in pounds of individual HAP per gallon of material.
  - f. The number of gallons of each cleanup material employed.
  - g. The number of gallons of cleanup material recovered for disposal.
  - h. The total individual HAP emissions for each HAP from all coatings, primers, undercoats, intermediates, and cleanup materials, in tons per month. (i.e., the sum of [(C.2.b.) x (C.2.c.) x (appropriate loss factor)] + [(C.2.e.) x (C.2.f. - C.2.g.) x (0.04)] for each individual HAP, divided by 2,000 lbs/ton.)
  - i. During the first 12 calendar months of operation following issuance of this permit, the cumulative total of individual HAP emissions from all emissions units at the facility, in tons. After the first 12 calendar months of operation following the issuance of this permit,

**Rubt**

**PTI /**

Emissions Unit ID: **P003**

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

the rolling, 12-month summation of the total individual HAP emissions from all emissions units at the facility, in tons.

- j. The total combined HAP emissions from all coatings, primers, undercoats, intermediates, and cleanup materials, in tons per month (i.e., sum of individual HAP emissions from all coatings, primers, undercoats, intermediates, and cleanup materials as determined in C.2.h).
- k. During the first 12 calendar months of operation following issuance of this permit, the cumulative total combined HAP emissions from all emissions units at the facility, in tons. After the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the total combined HAP emissions from all emissions units at the facility, in tons.

\*A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA district office or local air agency contact. This information does not have to be kept on a line-by-line basis.

- 3. The permit to install for this emissions unit (P003) was evaluated based on the actual materials (typically coatings and cleanup 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 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: 2-diethylaminoethanol

TLV (mg/m3): 9.6

Maximum Hourly Emission Rate (lbs/hr): 0.02

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3.857

MAGLC (ug/m3): 228.6

Pollutant: styrene

**Rubber Seal**

PTI Application 08 01055

**Issue**

**Facility ID: 0857733184**

Emissions Unit ID: **P003**

TLV (mg/m3): 85

Maximum Hourly Emission Rate (lbs/hr): 0.17

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 33.17

MAGLC (ug/m3): 2023

Pollutant: toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 12.27

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2387

MAGLC (ug/m3): 4476

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 still 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.).

**Rubt**

**PTI /**

Emissions Unit ID: **P003**

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

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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

4. 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 which include the following information:

- a. An identification of each month during which the average daily organic compound emissions from the coatings exceeded 24 pounds per day, and the actual organic compound emissions for each such day.
- b. An identification of all exceedances of the rolling, 12-month individual HAP emission limitation, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations specified in Section A.2.b of these terms and conditions.
- c. An identification of all exceedances of the rolling, 12-month total combined HAPs emission limitation, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations specified in Section A.2.b of these terms and conditions.

These deviation reports shall be submitted in accordance with Part 1, General Condition 2 of these terms and conditions.

2. The permittee shall submit annual reports which specify the organic compound emissions, in tons, from this emissions unit. The permittee also shall submit annual reports which specify the individual HAP and total combined HAP emissions, in tons, from all emissions units at the facility. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

## E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation -  
  
1.0 lb OC/hour  
  
Applicable Compliance Method -  
  
Compliance shall be determined by multiplying the maximum batch capacity of this emissions unit by the maximum organic compound content of all coatings mixed and the facility determined mass balance loss factor of 0.2%, divided by the number of hours in a batch.
  - b. Emission Limitation -

**Rubt**

**PTI /**

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

Emissions Unit ID: **P003**

24 lbs OC/day

**Rubt**

**PTI /**

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

Emissions Unit ID: **P003**

Applicable Compliance Method -

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

c. Emission Limitation -

4.38 TPY OC

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.1. and shall be the sum of the monthly organic compound emission rates for the calendar year, divided by 2,000 pounds per ton.

d. Emission Limitation -

9.9 TPY any individual HAP from all emissions units at the facility, as a rolling, 12-month summation

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.2.

e. Emission Limitation -

24.9 TPY total combined HAPs from all emissions units at the facility, as a rolling, 12-month summation

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.2.

**F. Miscellaneous Requirements**

None

Rubt

PTI /

Emissions Unit ID: P004

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>
P004 - 400 gallon clear coat mixer No. 4 with filling station	OAC rule 3745-31-05(A)(3)  OAC rule 3745-35-07 Federally enforceable limitations to avoid Title V.  OAC rule 3745-21-07(G)(2)	1.0 lb/hour and 24 lbs/day organic compounds (OC)  4.38 TPY OC  The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07.  Combined annual emissions from all emissions units at the facility shall not exceed 9.9 tons of any individual hazardous air pollutant (HAP), as a rolling, 12-month summation.  Combined annual emissions from all emissions units at the facility shall not exceed 24.9 tons of all HAPs, as a rolling, 12-month summation.  The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

**Rubber Seal**

**PTI**

**Issue**

**Facility ID: 0857733184**

**Emissions Unit ID: P004**

Rubt

PTI /

Emissions Unit ID: P004

Issued: To be entered upon final issuance

**2. Additional Terms and Conditions**

**2.a** The 1.0 lb OC/hour emission limitation is being developed 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 limit.

**2.b** To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table for the total combined emissions from all emissions units at the facility:

Month	Individual HAP Limit	Total Combined HAPs Limit
1	0.9 tons	2.25 tons
1 - 2	1.8 tons	4.50 tons
1 - 3	2.7 tons	6.75 tons
1 - 4	3.6 tons	9.00 tons
1 - 5	4.5 tons	11.25 tons
1 - 6	5.4 tons	13.50 tons
1 - 7	6.3 tons	15.75 tons
1 - 8	7.2 tons	18.00 tons
1 - 9	8.1 tons	20.25 tons
1 - 10	9.0 tons	22.50 tons
1 - 11	9.9 tons	24.75 tons
1 - 12	9.9 tons	24.90 tons

After the first 12 calendar months of operation following the issuance of this permit, compliance with the facility-wide HAP emission limitations shall be based upon rolling, 12-month summations of the monthly emissions, in tons.

**B. Operational Restrictions**

None

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each month for this coating mixer:
  - a. The company identification for each coating produced.
  - b. The number of gallons of each coating produced.

**Rubt**

**PTI /**

Emissions Unit ID: **P004**

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

- c. The organic compound content of each coating produced, in pounds per gallon.
  - d. The total organic compound emission rate for all coatings produced, in pounds per month calculated by multiplying the number of gallons of each coating produced by its respective organic compound content and the facility determined mass balance loss factor of 0.2%.
  - e. The total number of days this coating mixer was in operation for the month.
  - f. The average daily organic compound emission rate, in pounds per day (i.e., (d)/(e)).
2. The permittee shall collect and record the following information each month for the entire facility (including, but not limited to emissions units P001, P002, P003, P004, P005, P006, P007, P008, and P009):
- a. The name and identification number of each coating, primer, undercoat, and intermediate produced.
  - b. The individual HAP\* content for each HAP of each coating, primer, undercoat, and intermediate produced, in pounds of individual HAP per gallon of coating.
  - c. The number of gallons of each coating, primer, undercoat, and intermediate produced.
  - d. The name and identification of each cleanup material employed.
  - e. The individual HAP\* content for each HAP of each cleanup material, in pounds of individual HAP per gallon of material.
  - f. The number of gallons of each cleanup material employed.
  - g. The number of gallons of cleanup material recovered for disposal.
  - h. The total individual HAP emissions for each HAP from all coatings, primers, undercoats, intermediates, and cleanup materials, in tons per month. (i.e., the sum of [(C.2.b.) x (C.2.c.) x (appropriate loss factor)] + [(C.2.e.) x (C.2.f. - C.2.g.) x (0.04)] for each individual HAP, divided by 2,000 lbs/ton.)
  - i. During the first 12 calendar months of operation following issuance of this permit, the cumulative total of individual HAP emissions from all emissions units at the facility, in tons. After the first 12 calendar months of operation following the issuance of this permit,

Emissions Unit ID: P004

the rolling, 12-month summation of the total individual HAP emissions from all emissions units at the facility, in tons.

- j. The total combined HAP emissions from all coatings, primers, undercoats, intermediates, and cleanup materials, in tons per month (i.e., sum of individual HAP emissions from all coatings, primers, undercoats, intermediates, and cleanup materials as determined in C.2.h).
- k. During the first 12 calendar months of operation following issuance of this permit, the cumulative total combined HAP emissions from all emissions units at the facility, in tons. After the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the total combined HAP emissions from all emissions units at the facility, in tons.

\*A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA district office or local air agency contact. This information does not have to be kept on a line-by-line basis.

- 3. The permit to install for this emissions unit (P004) was evaluated based on the actual materials (typically coatings and cleanup 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 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: 2-diethylaminoethanol

TLV (mg/m3): 9.6

Maximum Hourly Emission Rate (lbs/hr): 0.02

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3.857

MAGLC (ug/m3): 228.6

Pollutant: styrene

**Rubt**

**PTI**

Emissions Unit ID: **P004**

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

TLV (mg/m3): 85

Maximum Hourly Emission Rate (lbs/hr): 0.17

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 33.17

MAGLC (ug/m3): 2023

Pollutant: toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 12.27

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2387

MAGLC (ug/m3): 4476

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 still 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.).

**Rubt**

**PTI /**

Emissions Unit ID: **P004**

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

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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

4. 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 which include the following information:

- a. An identification of each month during which the average daily organic compound emissions from the coatings exceeded 24 pounds per day, and the actual organic compound emissions for each such day.
- b. An identification of all exceedances of the rolling, 12-month individual HAP emission limitation, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations specified in Section A.2.b of these terms and conditions.
- c. An identification of all exceedances of the rolling, 12-month total combined HAPs emission limitation, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations specified in Section A.2.b of these terms and conditions.

These deviation reports shall be submitted in accordance with Part 1, General Condition 2 of these terms and conditions.

2. The permittee shall submit annual reports which specify the organic compound emissions, in tons, from this emissions unit. The permittee shall also submit annual reports which specify the individual HAP and total combined HAP emissions, in tons, from all emissions units at the facility. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

#### **E. Testing Requirements**

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

- a. Emission Limitation -

1.0 lb OC/hour

Applicable Compliance Method -

Compliance shall be determined by multiplying the maximum batch capacity of this emissions unit by the maximum organic compound content of all coatings mixed and the facility determined mass balance loss factor of 0.2%, divided by the number of hours in a batch.

- b. Emission Limitation -

**Rubt**

**PTI /**

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

Emissions Unit ID: **P004**

24 lbs OC/day

Applicable Compliance Method -

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

c. Emission Limitation -

4.38 TPY OC

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.1. and shall be the sum of the monthly organic compound emission rates for the calendar year, divided by 2,000 pounds per ton.

d. Emission Limitation -

9.9 TPY any individual HAP from all emissions units at the facility, as a rolling, 12-month summation

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.2.

e. Emission Limitation -

24.9 TPY total combined HAPs from all emissions units at the facility, as a rolling, 12-month summation

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.2.

## **F. Miscellaneous Requirements**

None

Rubt

PTI /

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 - 600 gallon primer mixer with 60 Hp disperser and filling station	OAC rule 3745-31-05(A)(3)  OAC rule 3745-35-07 Federally enforceable limitations to avoid Title V.  OAC rule 3745-21-07(G)(2)	2.45 lbs/hour and 40 lbs/day organic compounds (OC)  7.3 TPY OC  The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07.  Combined annual emissions from all emissions units at the facility shall not exceed 9.9 tons of any individual hazardous air pollutant (HAP), as a rolling, 12-month summation.  Combined annual emissions from all emissions units at the facility shall not exceed 24.9 tons of all HAPs, as a rolling, 12-month summation.  The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

**Rubber Seal**

**PTI**

**Issue**

**Facility ID: 0857733184**

**Emissions Unit ID: P005**

Rubt

PTI /

Emissions Unit ID: **P005**

Issued: To be entered upon final issuance

**2. Additional Terms and Conditions**

**2.a** The 2.45 lbs OC/hour emission limitation is being developed 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 limit.

**2.b** To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table for the total combined emissions from all emissions units at the facility:

Month	Individual HAP Limit	Total Combined HAPs Limit
1	0.9 tons	2.25 tons
1 - 2	1.8 tons	4.50 tons
1 - 3	2.7 tons	6.75 tons
1 - 4	3.6 tons	9.00 tons
1 - 5	4.5 tons	11.25 tons
1 - 6	5.4 tons	13.50 tons
1 - 7	6.3 tons	15.75 tons
1 - 8	7.2 tons	18.00 tons
1 - 9	8.1 tons	20.25 tons
1 - 10	9.0 tons	22.50 tons
1 - 11	9.9 tons	24.75 tons
1 - 12	9.9 tons	24.90 tons

After the first 12 calendar months of operation following the issuance of this permit, compliance with the facility-wide HAP emission limitations shall be based upon rolling, 12-month summations of the monthly emissions, in tons.

**B. Operational Restrictions**

1. The maximum daily primer production rate for this emissions unit shall not exceed 816 gallons.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each day for this primer mixer:

- a. The company identification for each primer produced.
- b. The number of gallons of each primer produced.

**Rubk**

**PTI /**

Emissions Unit ID: **P005**

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

- c. The total number of gallons of primer produced.
- d. The organic compound content of each primer produced, in pounds per gallon.

**Rubt**

**PTI /**

Emissions Unit ID: **P005**

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

- e. The total organic compound emission rate for all primers produced, in pounds per day calculated by multiplying the number of gallons of each primer produced by its respective organic compound content and the AP-42 Section 6.4.1 (1/95) loss factor of 1%.
2. The permittee shall collect and record the following information each month for the entire facility (including, but not limited to emissions units P001, P002, P003, P004, P005, P006, P007, P008, and P009):
- a. The name and identification number of each coating, primer, undercoat, and intermediate produced.
  - b. The individual HAP\* content for each HAP of each coating, primer, undercoat, and intermediate produced, in pounds of individual HAP per gallon of coating.
  - c. The number of gallons of each coating, primer, undercoat, and intermediate produced.
  - d. The name and identification of each cleanup material employed.
  - e. The individual HAP\* content for each HAP of each cleanup material, in pounds of individual HAP per gallon of material.
  - f. The number of gallons of each cleanup material employed.
  - g. The number of gallons of cleanup material recovered for disposal.
  - h. The total individual HAP emissions for each HAP from all coatings, primers, undercoats, intermediates, and cleanup materials, in tons per month. (i.e., the sum of [(C.2.b.) x (C.2.c.) x (appropriate loss factor)] + [(C.2.e.) x (C.2.f. - C.2.g.) x (0.04)] for each individual HAP, divided by 2,000 lbs/ton.)
  - i. During the first 12 calendar months of operation following issuance of this permit, the cumulative total of individual HAP emissions from all emissions units at the facility, in tons. After the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the total individual HAP emissions from all emissions units at the facility, in tons.
  - j. The total combined HAP emissions from all coatings, primers, undercoats, intermediates, and cleanup materials, in tons per month (i.e., sum of individual HAP emissions from all coatings, primers, undercoats, intermediates, and cleanup materials as determined in

C.2.h).

- k. During the first 12 calendar months of operation following issuance of this permit, the cumulative total combined HAP emissions from all emissions units at the facility, in tons. After the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the total combined HAP emissions from all emissions units at the facility, in tons.

\*A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA district office or local air agency contact. This information does not have to be kept on a line-by-line basis.

- 3. The permit to install for this emissions unit (P005) was evaluated based on the actual materials (typically coatings and cleanup 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 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: styrene

TLV (mg/m3): 85

Maximum Hourly Emission Rate (lbs/hr): 0.17

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 33.17

MAGLC (ug/m3): 2023

Pollutant: isobutyl alcohol

TLV (mg/m3): 151

Maximum Hourly Emission Rate (lbs/hr): 12.27

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2387

**Rubt**

**PTI /**

Emissions Unit ID: **P005**

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

MAGLC (ug/m3): 3595

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.).

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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

4. 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 which include the following information:
  - a. An identification of each day during which the organic compound emissions from the primers exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
  - b. An identification of each day during which the daily primer production for this emissions unit exceeded 816 gallons per day, and the actual primer production for each such day.
  - c. An identification of all exceedances of the rolling, 12-month individual HAP emission limitation, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations specified in Section A.2.b of these terms and conditions.

**Rubt**

**PTI /**

Emissions Unit ID: **P005**

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

- d. An identification of all exceedances of the rolling, 12-month total combined HAPs emission limitation, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations specified in Section A.2.b of these terms and conditions.

These deviation reports shall be submitted in accordance with Part 1, General Condition 2 of these terms and conditions.

2. The permittee shall submit annual reports which specify the organic compound emissions, in tons, from this emissions unit. The permittee shall also submit annual reports which specify the individual HAP and total combined HAP emissions, in tons, from all emissions units at the facility. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

#### **E. Testing Requirements**

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

- a. Emission Limitation -

2.45 lbs OC/hour

Applicable Compliance Method -

Compliance shall be determined by multiplying the maximum batch capacity of this emissions unit by the maximum organic compound content of all primers mixed and the AP-42 Section 6.4.1 (1/95) loss factor of 1%, divided by the number of hours in a batch.

- b. Emission Limitation -

40 lbs OC/day

Applicable Compliance Method -

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

- c. Emission Limitation -

**Rubt**

**PTI /**

Emissions Unit ID: **P005**

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

7.3 TPY OC

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.1. and shall be the sum of the daily organic compound emission rates for the calendar year, divided by 2,000 pounds per ton.

d. Emission Limitation -

9.9 TPY any individual HAP from all emissions units at the facility, as a rolling, 12-month summation

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.2.

e. Emission Limitation -

24.9 TPY total combined HAPs from all emissions units at the facility, as a rolling, 12-month summation

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.2.

f. Operational Limitation -

816 gallons/day primer production

Applicable Compliance Method -

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

**F. Miscellaneous Requirements**

None



**Rubber Seal**

**PTI**

**Issue**

**Facility ID: 0857733184**

**Emissions Unit ID: P006**

Rubt

PTI /

Emissions Unit ID: **P006**

Issued: To be entered upon final issuance

**2. Additional Terms and Conditions**

**2.a** The 1.63 lbs OC/hour emission limitation is being developed 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 limit.

**2.b** To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table for the total combined emissions from all emissions units at the facility:

Month	Individual HAP Limit	Total Combined HAPs Limit
1	0.9 tons	2.25 tons
1 - 2	1.8 tons	4.50 tons
1 - 3	2.7 tons	6.75 tons
1 - 4	3.6 tons	9.00 tons
1 - 5	4.5 tons	11.25 tons
1 - 6	5.4 tons	13.50 tons
1 - 7	6.3 tons	15.75 tons
1 - 8	7.2 tons	18.00 tons
1 - 9	8.1 tons	20.25 tons
1 - 10	9.0 tons	22.50 tons
1 - 11	9.9 tons	24.75 tons
1 - 12	9.9 tons	24.90 tons

After the first 12 calendar months of operation following the issuance of this permit, compliance with the facility-wide HAP emission limitations shall be based upon rolling, 12-month summations of the monthly emissions, in tons.

**B. Operational Restrictions**

None

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each day for this primer mixer:
  - a. The company identification for each primer produced.
  - b. The number of gallons of each primer produced.

**Rubt**

**PTI /**

Emissions Unit ID: **P006**

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

- c. The organic compound content of each primer produced, in pounds per gallon.
  - d. The total organic compound emission rate for all primers produced, in pounds per day calculated by multiplying the number of gallons of each primer produced by its respective organic compound content and the AP-42 Section 6.4.1 (1/95) loss factor of 1%.
2. The permittee shall collect and record the following information each month for the entire facility (including, but not limited to emissions units P001, P002, P003, P004, P005, P006, P007, P008, and P009):
- a. The name and identification number of each coating, primer, undercoat, and intermediate produced.
  - b. The individual HAP\* content for each HAP of each coating, primer, undercoat, and intermediate produced, in pounds of individual HAP per gallon of coating.
  - c. The number of gallons of each coating, primer, undercoat, and intermediate produced.
  - d. The name and identification of each cleanup material employed.
  - e. The individual HAP\* content for each HAP of each cleanup material, in pounds of individual HAP per gallon of material.
  - f. The number of gallons of each cleanup material employed.
  - g. The number of gallons of cleanup material recovered for disposal.
  - h. The total individual HAP emissions for each HAP from all coatings, primers, undercoats, intermediates, and cleanup materials, in tons per month. (i.e., the sum of [(C.2.b.) x (C.2.c.) x (appropriate loss factor)] + [(C.2.e.) x (C.2.f. - C.2.g.) x (0.04)] for each individual HAP, divided by 2,000 lbs/ton.)
  - i. During the first 12 calendar months of operation following issuance of this permit, the cumulative total of individual HAP emissions from all emissions units at the facility, in tons. After the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the total individual HAP emissions from all emissions units at the facility, in tons.
  - j. The total combined HAP emissions from all coatings, primers, undercoats, intermediates and cleanup materials, in tons per month (i.e., sum of individual HAP emissions from all

Emissions Unit ID: P006

coatings, primers, undercoats, intermediates, and cleanup materials as determined in C.2.h).

- k. During the first 12 calendar months of operation following issuance of this permit, the cumulative total combined HAP emissions from all emissions units at the facility, in tons. After the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the total combined HAP emissions from all emissions units at the facility, in tons.

\*A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA district office or local air agency contact. This information does not have to be kept on a line-by-line basis.

- 3. The permit to install for this emissions unit (P006) was evaluated based on the actual materials (typically coatings and cleanup 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 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: styrene

TLV (mg/m3): 85

Maximum Hourly Emission Rate (lbs/hr): 0.17

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 33.17

MAGLC (ug/m3): 2023

Pollutant: isobutyl alcohol

TLV (mg/m3): 151

Maximum Hourly Emission Rate (lbs/hr): 12.27

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2387

**Rubt**

**PTI /**

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

Emissions Unit ID: **P006**

MAGLC (ug/m3): 3595

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 still 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;

**Rubt**

**PTI /**

Emissions Unit ID: **P006**

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

- 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.).

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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

- 4. 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 which include the following information:
  - a. An identification of each day during which the organic compound emissions from the primers exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
  - b. An identification of all exceedances of the rolling, 12-month individual HAP emission limitation, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations specified in Section A.2.b of these terms and conditions.

**Rubber Seal**

**PTI**

**Issue**

**Facility ID: 0857733184**

Emissions Unit ID: **P006**

- c. An identification of all exceedances of the rolling, 12-month total combined HAPs emission limitation, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations specified in Section A.2.b of these terms and conditions.

**Rubt**

**PTI /**

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

Emissions Unit ID: **P006**

These deviation reports shall be submitted in accordance with Part 1, General Condition 2 of these terms and conditions.

2. The permittee shall submit annual reports which specify the organic compound emissions, in tons, from this emissions unit. The permittee shall also submit annual reports which specify the individual HAP and total combined HAP emissions, in tons, from all emissions units at the facility. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

**E. Testing Requirements**

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

- a. Emission Limitation -

1.63 lbs OC/hour

Applicable Compliance Method -

Compliance shall be determined by multiplying the maximum batch capacity of this emissions unit by the maximum organic compound content of all primers mixed and the AP-42 Section 6.4.1 (1/95) loss factor of 1%, divided by the number of hours in a batch.

- b. Emission Limitation -

40 lbs OC/day

Applicable Compliance Method -

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

- c. Emission Limitation -

7.3 TPY OC

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.1. and shall be the sum of

**Rubt**

**PTI /**

Emissions Unit ID: **P006**

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

the daily organic compound emission rates for the calendar year, divided by 2,000 pounds per ton.

d. Emission Limitation -

9.9 TPY any individual HAP from all emissions units at the facility, as a rolling, 12-month summation

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.2.

e. Emission Limitation -

24.9 TPY total combined HAPs from all emissions units at the facility, as a rolling, 12-month summation

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.2.

**F. Miscellaneous Requirements**

None

Rubt

PTI /

Emissions Unit ID: P007

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**

- 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 - 400 gallon undercoat mixer with 30 Hp disperser and filling station	<p>OAC rule 3745-31-05(A)(3)</p> <p>OAC rule 3745-35-07 Federally enforceable limitations to avoid Title V.</p> <p>OAC rule 3745-21-07(G)(2)</p>	<p>1.64 lbs/hour and 40 lbs/day organic compounds (OC)</p> <p>7.3 TPY OC</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07.</p> <p>Combined annual emissions from all emissions units at the facility shall not exceed 9.9 tons of any individual hazardous air pollutant (HAP), as a rolling, 12-month summation.</p> <p>Combined annual emissions from all emissions units at the facility shall not exceed 24.9 tons of all HAPs, as a rolling, 12-month summation.</p> <p>The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule</p>

**Rubber Seal**  
**PTI**  
**Issue**

**Facility ID: 0857733184**

Emissions Unit ID: **P007**

3745-31-05(A)(3).

Rubt

PTI /

Emissions Unit ID: P007

Issued: To be entered upon final issuance

**2. Additional Terms and Conditions**

**2.a** The 1.64 lbs OC/hour emission limitation is being developed 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 limit.

**2.b** To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table for the total combined emissions from all emissions units at the facility:

Month	Individual HAP Limit	Total Combined HAPs Limit
1	0.9 tons	2.25 tons
1 - 2	1.8 tons	4.50 tons
1 - 3	2.7 tons	6.75 tons
1 - 4	3.6 tons	9.00 tons
1 - 5	4.5 tons	11.25 tons
1 - 6	5.4 tons	13.50 tons
1 - 7	6.3 tons	15.75 tons
1 - 8	7.2 tons	18.00 tons
1 - 9	8.1 tons	20.25 tons
1 - 10	9.0 tons	22.50 tons
1 - 11	9.9 tons	24.75 tons
1 - 12	9.9 tons	24.90 tons

After the first 12 calendar months of operation following the issuance of this permit, compliance with the facility-wide HAP emission limitations shall be based upon rolling, 12-month summations of the monthly emissions, in tons.

**B. Operational Restrictions**

None

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each day for this undercoat mixer:
  - a. The company identification for each undercoat produced.
  - b. The number of gallons of each undercoat produced.

**Rubt**

**PTI /**

Emissions Unit ID: **P007**

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

- c. The organic compound content of each undercoat produced, in pounds per gallon.
  - d. The total organic compound emission rate for all undercoats produced, in pounds per day calculated by multiplying the number of gallons of each undercoat produced by its respective organic compound content and the AP-42 Section 6.4.1 (1/95) loss factor of 1%.
2. The permittee shall collect and record the following information each month for the entire facility (including, but not limited to emissions units P001, P002, P003, P004, P005, P006, P007, P008, and P009):
- a. The name and identification number of each coating, primer, undercoat, and intermediate produced.
  - b. The individual HAP\* content for each HAP of each coating, primer, undercoat, and intermediate produced, in pounds of individual HAP per gallon of coating.
  - c. The number of gallons of each coating, primer, undercoat, and intermediate produced.
  - d. The name and identification of each cleanup material employed.
  - e. The individual HAP\* content for each HAP of each cleanup material, in pounds of individual HAP per gallon of material.
  - f. The number of gallons of each cleanup material employed.
  - g. The number of gallons of cleanup material recovered for disposal.
  - h. The total individual HAP emissions for each HAP from all coatings, primers, undercoats, intermediates, and cleanup materials, in tons per month. (i.e., the sum of [(C.2.b.) x (C.2.c.) x (appropriate loss factor)] + [(C.2.e.) x (C.2.f. - C.2.g.) x (0.04)] for each individual HAP, divided by 2,000 lbs/ton.)
  - i. During the first 12 calendar months of operation following issuance of this permit, the cumulative total of individual HAP emissions from all emissions units at the facility, in tons. After the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the total individual HAP emissions from all emissions units at the facility, in tons.

Emissions Unit ID: P007

- j. The total combined HAP emissions from all coatings, primers, undercoats, intermediates, and cleanup materials, in tons per month (i.e., sum of individual HAP emissions from all coatings, primers, undercoats, intermediates, and cleanup materials as determined in C.2.h).
- k. During the first 12 calendar months of operation following issuance of this permit, the cumulative total combined HAP emissions from all emissions units at the facility, in tons. After the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the total combined HAP emissions from all emissions units at the facility, in tons.

\*A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA district office or local air agency contact. This information does not have to be kept on a line-by-line basis.

- 3. The permit to install for this emissions unit (P007) was evaluated based on the actual materials (typically coatings and cleanup 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 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

Maximum Hourly Emission Rate (lbs/hr): 12.27

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2387

MAGLC (ug/m3): 4476

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 still 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

**Rubt**

**PTI**

Emissions Unit ID: **P007**

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

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.).

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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

4. 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 which include the following information:
  - a. An identification of each day during which the organic compound emissions from the

undercoats exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

- b. An identification of all exceedances of the rolling, 12-month individual HAP emission limitation, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations specified in Section A.2.b of these terms and conditions.
- c. An identification of all exceedances of the rolling, 12-month total combined HAPs emission limitation, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations specified in Section A.2.b of these terms and conditions.

These deviation reports shall be submitted in accordance with Part 1, General Condition 2 of these terms and conditions.

2. The permittee shall submit annual reports which specify the organic compound emissions, in tons, from this emissions unit. The permittee shall also submit annual reports which specify the individual HAP and total combined HAP emissions, in tons, from all emissions units at the facility. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

**E. Testing Requirements**

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

**Rubt**

**PTI /**

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

Emissions Unit ID: **P007**

- a. Emission Limitation -

1.64 lbs OC/hour

Applicable Compliance Method -

Compliance shall be determined by multiplying the maximum batch capacity of this emissions unit by the maximum organic compound content of all undercoats mixed and the AP-42 Section 6.4.1 (1/95) loss factor of 1%, divided by the number of hours in a batch.

- b. Emission Limitation -

40 lbs OC/day

Applicable Compliance Method -

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

- c. Emission Limitation -

7.3 TPY OC

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.1. and shall be the sum of the daily organic compound emission rates for the calendar year, divided by 2,000 pounds per ton.

- d. Emission Limitation -

9.9 TPY any individual HAP from all emissions units at the facility, as a rolling, 12-month summation

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.2.

- e. Emission Limitation -

**Rubt**

**PTI /**

Emissions Unit ID: **P007**

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

24.9 TPY total combined HAPs from all emissions units at the facility, as a rolling, 12-month summation

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.2.

**F. Miscellaneous Requirements**

None

Rubt

PTI /

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 - 300 gallon high speed intermediates mixer and filling station	OAC rule 3745-31-05(A)(3)  OAC rule 3745-35-07 Federally enforceable limitations to avoid Title V.  OAC rule 3745-21-07(G)(2)	2.55 lbs/hour and 40 lbs/day organic compounds (OC)  7.3 TPY OC  The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07.  Combined annual emissions from all emissions units at the facility shall not exceed 9.9 tons of any individual hazardous air pollutant (HAP), as a rolling, 12-month summation.  Combined annual emissions from all emissions units at the facility shall not exceed 24.9 tons of all HAPs, as a rolling, 12-month summation.  The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule

**Rubber Seal**  
**PTI**  
**Issue**

**Facility ID: 0857733184**

Emissions Unit ID: **P008**

3745-31-05(A)(3).

Rubt

PTI /

Emissions Unit ID: P008

Issued: To be entered upon final issuance

**2. Additional Terms and Conditions**

**2.a** The 2.55 lbs OC/hour emission limitation is being developed 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 limit.

**2.b** To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table for the total combined emissions from all emissions units at the facility:

Month	Individual HAP Limit	Total Combined HAPs Limit
1	0.9 tons	2.25 tons
1 - 2	1.8 tons	4.50 tons
1 - 3	2.7 tons	6.75 tons
1 - 4	3.6 tons	9.00 tons
1 - 5	4.5 tons	11.25 tons
1 - 6	5.4 tons	13.50 tons
1 - 7	6.3 tons	15.75 tons
1 - 8	7.2 tons	18.00 tons
1 - 9	8.1 tons	20.25 tons
1 - 10	9.0 tons	22.50 tons
1 - 11	9.9 tons	24.75 tons
1 - 12	9.9 tons	24.90 tons

After the first 12 calendar months of operation following the issuance of this permit, compliance with the facility-wide HAP emission limitations shall be based upon rolling, 12-month summations of the monthly emissions, in tons.

**B. Operational Restrictions**

1. The maximum daily intermediate production rate for this emissions unit shall not exceed 588 gallons.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each day for this intermediates mixer:

a. The company identification for each intermediate produced.

**Rubt**

**PTI /**

Emissions Unit ID: **P008**

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

- b. The number of gallons of each intermediate produced.
  - c. The total number of gallons of intermediates produced.
  - d. The organic compound content of each intermediate produced, in pounds per gallon.
  - e. The total organic compound emission rate for all intermediates produced, in pounds per day calculated by multiplying the number of gallons of each intermediate produced by its respective organic compound content and the AP-42 Section 6.4.1 (1/95) loss factor of 1%.
2. The permittee shall collect and record the following information each month for the entire facility (including, but not limited to emissions units P001, P002, P003, P004, P005, P006, P007, P008, and P009):
- a. The name and identification number of each coating, primer, undercoat, and intermediate produced.
  - b. The individual HAP\* content for each HAP of each coating, primer, undercoat, and intermediate produced, in pounds of individual HAP per gallon of coating.
  - c. The number of gallons of each coating, primer, undercoat, and intermediate produced.
  - d. The name and identification of each cleanup material employed.
  - e. The individual HAP\* content for each HAP of each cleanup material, in pounds of individual HAP per gallon of material.
  - f. The number of gallons of each cleanup material employed.
  - g. The number of gallons of cleanup material recovered for disposal.
  - h. The total individual HAP emissions for each HAP from all coatings, primers, undercoats, intermediates, and cleanup materials, in tons per month. (i.e., the sum of [(C.2.b.) x (C.2.c.) x (appropriate loss factor)] + [(C.2.e.) x (C.2.f. - C.2.g.) x (0.04)] for each individual HAP, divided by 2,000 lbs/ton.)
  - i. During the first 12 calendar months of operation following issuance of this permit, the cumulative total of individual HAP emissions from all emissions units at the facility, in tons. After the first 12 calendar months of operation following the issuance of this permit,

**Rubt**

**PTI /**

Emissions Unit ID: **P008**

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

the rolling, 12-month summation of the total individual HAP emissions from all emissions units at the facility, in tons.

- j. The total combined HAP emissions from all coatings, primers, undercoats, intermediates, and cleanup materials, in tons per month (i.e., sum of individual HAP emissions from all coatings, primers, undercoats, intermediates, and cleanup materials as determined in C.2.h).
- k. During the first 12 calendar months of operation following issuance of this permit, the cumulative total combined HAP emissions from all emissions units at the facility, in tons. After the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the total combined HAP emissions from all emissions units at the facility, in tons.

\*A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA district office or local air agency contact. This information does not have to be kept on a line-by-line basis.

- 3. The permit to install for this emissions unit (P008) was evaluated based on the actual materials (typically coatings and cleanup 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 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: 1-nitropropane

TLV (mg/m3): 91

Maximum Hourly Emission Rate (lbs/hr): 2.52

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 490.3

MAGLC (ug/m3): 2170

Pollutant: toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 12.27

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2387

MAGLC (ug/m3): 4476

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 still 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.).

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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

4. 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 which include the following information:
  - a. An identification of each day during which the organic compound emissions from the intermediates exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
  - b. An identification of each day during which the daily intermediate production for this emissions unit exceeded 588 gallons per day, and the actual intermediate production for each such day.
  - c. An identification of all exceedances of the rolling, 12-month individual HAP emission limitation, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations specified in Section A.2.b of these terms and conditions.
  - d. An identification of all exceedances of the rolling, 12-month total combined HAPs emission limitation, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations specified in Section A.2.b of these terms and conditions.

These deviation reports shall be submitted in accordance with Part 1, General Condition 2 of these terms and conditions.

2. The permittee shall submit annual reports which specify the organic compound emissions, in tons, from this emissions unit. The permittee shall also submit annual reports which specify the individual HAP and total combined HAP emissions, in tons, from all emissions units at the facility. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

#### E. Testing Requirements

**Rubt**

**PTI /**

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

Emissions Unit ID: **P008**

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation -  
  
2.55 lbs OC/hour  
  
Applicable Compliance Method -  
  
Compliance shall be determined by multiplying the maximum batch capacity of this emissions unit by the maximum organic compound content of all intermediates mixed and the AP-42 Section 6.4.1 (1/95) loss factor of 1%, divided by the number of hours in a batch.
  - b. Emission Limitation -  
  
40 lbs OC/day  
  
Applicable Compliance Method -  
  
Compliance shall be based upon record keeping as specified in C.1.
  - c. Emission Limitation -  
  
7.3 TPY OC  
  
Applicable Compliance Method -  
  
Compliance shall be based upon record keeping as specified in C.1. and shall be the sum of the daily organic compound emission rates for the calendar year, divided by 2,000 pounds per ton.
  - d. Emission Limitation -  
  
9.9 TPY any individual HAP from all emissions units at the facility, as a rolling, 12-month summation  
  
Applicable Compliance Method -

**Rubt**

**PTI /**

Emissions Unit ID: **P008**

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

Compliance shall be based upon record keeping as specified in C.2.

e. Emission Limitation -

24.9 TPY total combined HAPs from all emissions units at the facility, as a rolling, 12-month summation

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.2.

f. Operational Limitation -

588 gallons/day intermediate production

Applicable Compliance Method -

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

**F. Miscellaneous Requirements**

None

Rubt

PTI /

Emissions Unit ID: P009

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>
P009 - Tank cleanup operations	OAC rule 3745-31-05(A)(3)	1.2 lbs/hour and 28 lbs/day organic compounds (OC)
		5.3 TPY OC
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07.
	OAC rule 3745-35-07 Federally enforceable limitations to avoid Title V.	Combined annual emissions from all emissions units at the facility shall not exceed 9.9 tons of any individual hazardous air pollutant (HAP), as a rolling, 12-month summation.
	OAC rule 3745-21-07(G)(2)	Combined annual emissions from all emissions units at the facility shall not exceed 24.9 tons of all HAPs, as a rolling, 12-month summation.
		The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

**2. Additional Terms and Conditions**

- 2.a** The 1.2 lb OC/hour emission limitation is being developed 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 limit.
- 2.b** To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table for the total combined emissions from all emissions units at the facility:

Month	Individual HAP Limit	Total Combined HAPs Limit
1	0.9 tons	2.25 tons
1 - 2	1.8 tons	4.50 tons
1 - 3	2.7 tons	6.75 tons
1 - 4	3.6 tons	9.00 tons
1 - 5	4.5 tons	11.25 tons
1 - 6	5.4 tons	13.50 tons
1 - 7	6.3 tons	15.75 tons
1 - 8	7.2 tons	18.00 tons
1 - 9	8.1 tons	20.25 tons
1 - 10	9.0 tons	22.50 tons
1 - 11	9.9 tons	24.75 tons
1 - 12	9.9 tons	24.90 tons

After the first 12 calendar months of operation following the issuance of this permit, compliance with the facility-wide HAP emission limitations shall be based upon rolling, 12-month summations of the monthly emissions, in tons.

**B. Operational Restrictions**

None

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each month for the cleanup operations:
- a. The company identification of each cleanup material employed.
  - b. The organic compound content of each cleanup material employed, in pounds per gallon.

**Rubt**

**PTI /**

Emissions Unit ID: **P009**

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

- c. The number of gallons of each cleanup material employed.
  - d. The number of gallons of cleanup material recovered for disposal.
  - e. The total organic compound emission rate from all cleanup materials employed, in pounds per month calculated by multiplying the number of gallons of each cleanup employed minus the number of gallons of cleanup material recovered by its respective organic compound content and the facility derived mass balance loss factor of 4% (0.04).
  - f. The total number of days when cleanup operations were performed.
  - g. The average daily organic compound emission rate from cleanup operations. (i.e., (e)/(f))
2. The permittee shall collect and record the following information each month for the entire facility (including, but not limited to emissions units P001, P002, P003, P004, P005, P006, P007, P008, and P009):
- a. The name and identification number of each coating, primer, undercoat, and intermediate produced.
  - b. The individual HAP\* content for each HAP of each coating, primer, undercoat, and intermediate produced, in pounds of individual HAP per gallon of coating.
  - c. The number of gallons of each coating, primer, undercoat, and intermediate produced.
  - d. The name and identification of each cleanup material employed.
  - e. The individual HAP\* content for each HAP of each cleanup material, in pounds of individual HAP per gallon of material.
  - f. The number of gallons of each cleanup material employed.
  - g. The number of gallons of cleanup material recovered for disposal.
  - h. The total individual HAP emissions for each HAP from all coatings, primers, undercoats, intermediates, and cleanup materials, in tons per month. (i.e., the sum of [(C.2.b.) x (C.2.c.) x (appropriate loss factor)] + [(C.2.e.) x (C.2.f. - C.2.g.) x (0.04)] for each individual HAP, divided by 2,000 lbs/ton.)
  - i. During the first 12 calendar months of operation following issuance of this permit, the

Emissions Unit ID: **P009**

cumulative total of individual HAP emissions from all emissions units at the facility, in tons. After the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the total individual HAP emissions from all emissions units at the facility, in tons.

- j. The total combined HAP emissions from all coatings, primers, undercoats, intermediates, and cleanup materials, in tons per month (i.e., sum of individual HAP emissions from all coatings, primers, undercoats, intermediates, and cleanup materials as determined in C.2.h).
  
- k. During the first 12 calendar months of operation following issuance of this permit, the cumulative total combined HAP emissions from all emissions units at the facility, in tons. After the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the total combined HAP emissions from all emissions units at the facility, in tons.

**Rubt**

**PTI**

Emissions Unit ID: **P009**

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

\*A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA district office or local air agency contact. This information does not have to be kept on a line-by-line basis.

3. The permit to install for this emissions unit (P009) was evaluated based on the actual materials (typically coatings and cleanup 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 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/m<sup>3</sup>): 188

Maximum Hourly Emission Rate (lbs/hr): 1.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 231.4

MAGLC (ug/m<sup>3</sup>): 4476

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

**Rubt**

**PTI /**

Emissions Unit ID: **P009**

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

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.).

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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

4. 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 which include the following information:
  - a. An identification of each day during which the average daily organic compound emissions from the cleanup operations exceeded 28 pounds per day, and the actual organic compound emissions for each such day.
  - b. An identification of all exceedances of the rolling, 12-month individual HAP emission limitation, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations specified in Section A.2.b of these terms and conditions.
  - c. An identification of all exceedances of the rolling, 12-month total combined HAPs

**Rubber Seal**

**PTI**

**Issue**

**Facility ID: 0857733184**

Emissions Unit ID: **P009**

emission limitation, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the cumulative emission limitations specified in Section A.2.b of these terms and conditions.

These deviation reports shall be submitted in accordance with Part 1, General Condition 2 of these terms and conditions.

2. The permittee shall submit annual reports which specify the organic compound emissions, in tons, from this emissions unit. The permittee shall also submit annual reports which specify the individual HAP and total combined HAP emissions, in tons, from all emissions units at the facility. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

Rubt

PTI /

Issued: To be entered upon final issuance

Emissions Unit ID: P009

## E. Testing Requirements

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

a. Emission Limitation -

1.2 lbs OC/hour

Applicable Compliance Method -

Compliance shall be determined by multiplying the maximum hourly cleanup usage by the maximum organic compound content of all cleanup materials employed, and the facility derived mass balance solvent loss factor of 4% (0.04).

b. Emission Limitation -

28 lbs OC/day

Applicable Compliance Method -

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

c. Emission Limitation -

5.3 TPY OC

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.1. and shall be the sum of the twelve monthly organic compound emission rates for the calendar year, divided by 2,000 pounds per ton.

d. Emission Limitation -

9.9 TPY any individual HAP from all emissions units at the facility, as a rolling, 12-month summation

Applicable Compliance Method -

**Rubt**

**PTI /**

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

Emissions Unit ID: **P009**

Compliance shall be based upon record keeping as specified in C.2.

**Rubk**

**PTI /**

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

Emissions Unit ID: **P009**

e. Emission Limitation -

24.9 TPY total combined HAPs from all emissions units at the facility, as a rolling, 12-month summation

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.2.

**F. Miscellaneous Requirements**

None

**NEW SOURCE REVIEW FORM B**

PTI Number: 08-04055 Facility ID: 0857733184

FACILITY NAME Rubber Seal

FACILITY DESCRIPTION paints and allied products CITY/TWP Dayton

SIC CODE 2851 SCC CODE 4-02-999-98 EMISSIONS UNIT ID P001

EMISSIONS UNIT DESCRIPTION 400 gallon clear coat mixer No. 1 with filling station

DATE INSTALLED August 1996

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	attainment	1 lb/hour and 24 lbs/day	4.38	1 lb/hour and 24 lbs/day	4.38
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

**BAT is compliance with applicable rules and specified allowable mass emission rates; record keeping; and reporting.**

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

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

**TOXIC AIR CONTAMINANTS**

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

AIR TOXICS MODELING PERFORMED\*? X YES        NO

IDENTIFY THE AIR CONTAMINANTS: 2-diethylaminoethanol, styrene, and toluene

**NEW SOURCE REVIEW FORM B**

PTI Number: 08-04055 Facility ID: 0857733184

FACILITY NAME Rubber Seal

FACILITY DESCRIPTION paints and allied products CITY/TWP Davton

Emissions Unit ID: P009

SIC CODE 2851 SCC CODE 4-02-999-98 EMISSIONS UNIT ID P002

EMISSIONS UNIT DESCRIPTION 400 gallon clear coat mixer No. 2 with filling station

DATE INSTALLED August 1996

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	attainment	1 lb/hour and 24 lbs/day	4.38	1 lb/hour and 24 lbs/day	4.38
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

BAT is compliance with applicable rules and specified allowable mass emission rates; record keeping; and reporting.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

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

**TOXIC AIR CONTAMINANTS**

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

AIR TOXICS MODELING PERFORMED\*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: 2-diethylaminoethanol, styrene, and toluene

**NEW SOURCE REVIEW FORM B**

PTI Number: 08-04055 Facility ID: 0857733184

FACILITY NAME Rubber Seal

FACILITY DESCRIPTION paints and allied products CITY/TWP Davton

Emissions Unit ID: P009

SIC CODE 2851 SCC CODE 4-02-999-98 EMISSIONS UNIT ID P003

EMISSIONS UNIT DESCRIPTION 400 gallon clear coat mixer No. 3 with filling station

DATE INSTALLED August 1996

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	attainment	1 lb/hour and 24 lbs/day	4.38	1 lb/hour and 24 lbs/day	4.38
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

BAT is compliance with applicable rules and specified allowable mass emission rates; record keeping; and reporting.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

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

**TOXIC AIR CONTAMINANTS**

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

AIR TOXICS MODELING PERFORMED\*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: 2-diethylaminoethanol, styrene, and toluene

**NEW SC**

PTI Num

FACILITY

Emissions Unit ID: **P009**

FACILITY DESCRIPTION paints and allied products CITY/TWP Dayton

SIC CODE 2851 SCC CODE 4-02-999-98 EMISSIONS UNIT ID P004

EMISSIONS UNIT DESCRIPTION 400 gallon clear coat mixer No. 4 with filling station

DATE INSTALLED August 1996

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	attainment	1 lb/hour and 24 lbs/day	4.38	1 lb/hour and 24 lbs/day	4.38
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NPSPS? NESHAP? PSD? OFFSET POLICY?

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

**BAT is compliance with applicable rules and specified allowable mass emission rates; record keeping; and reporting.**

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

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

**TOXIC AIR CONTAMINANTS**

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

AIR TOXICS MODELING PERFORMED\*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: 2-diethylaminoethanol, styrene, and toluene

**NEW SOURCE REVIEW FORM B**

PTI Number: 08-04055 Facility ID: 0857733184

FACILITY NAME Rubber Seal

FACILITY DESCRIPTION paints and allied products CITY/TWP Davton

Emissions Unit ID: P009

SIC CODE 2851 SCC CODE 4-02-999-98 EMISSIONS UNIT ID P005

EMISSIONS UNIT DESCRIPTION 600 gallon primer mixer with 60 Hp disperser and filling station

DATE INSTALLED August 1996

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	attainment	2.45 lbs/hour and 40 lbs/day	7.3	2.45 lbs/hour and 40 lbs/day	7.3
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

**BAT is compliance with applicable rules and specified allowable mass emission rates; daily primer production limitation; record keeping; and reporting.**

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

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

**TOXIC AIR CONTAMINANTS**

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

AIR TOXICS MODELING PERFORMED\*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: styrene and isobutyl alcohol

**NEW SOURCE REVIEW FORM B**

PTI Number: 08-04055 Facility ID: 0857733184

FACILITY NAME Rubber Seal

FACILITY DESCRIPTION paints and allied products CITY/TWP Davton

Emissions Unit ID: P009

SIC CODE 2851 SCC CODE 4-02-999-98 EMISSIONS UNIT ID P006

EMISSIONS UNIT DESCRIPTION 400 gallon primer mixer with 60 Hp disperser and filling station

DATE INSTALLED August 1996

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	attainment	1.63 lbs/hour and 40 lbs/day	7.3	1.63 lbs/hour and 40 lbs/day	7.3
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

BAT is compliance with applicable rules and specified allowable mass emission rates; record keeping; and reporting.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes
OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED\*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: styrene and isobutyl alcohol

**NEW SC**

PTI Num

FACILITY

Emissions Unit ID: **P009** \_\_\_\_\_

FACILITY DESCRIPTION paints and allied products CITY/TWP Dayton

SIC CODE 2851 SCC CODE 4-02-999-98 EMISSIONS UNIT ID P007

EMISSIONS UNIT DESCRIPTION 400 gallon undercoat mixer with 30 Hp disperser and filling station

DATE INSTALLED August 1996

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	attainment	1.64 lbs/hour and 40 lbs/day	7.3	1.64 lbs/hour and 40 lbs/day	7.3
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NPSPS? \_\_\_\_\_ NESHAP? \_\_\_\_\_ PSD? \_\_\_\_\_ OFFSET POLICY? \_\_\_\_\_

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

**BAT is compliance with applicable rules and specified allowable mass emission rates; record keeping; and reporting.**

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

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

**TOXIC AIR CONTAMINANTS**

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

AIR TOXICS MODELING PERFORMED\*? X YES        NO

IDENTIFY THE AIR CONTAMINANTS: toluene

**NEW SOURCE REVIEW FORM B**

PTI Number: 08-04055 Facility ID: 0857733184

FACILITY NAME Rubber Seal

FACILITY DESCRIPTION paints and allied products CITY/TWP Davton

Emissions Unit ID: P009

SIC CODE 2851 SCC CODE 4-02-999-98 EMISSIONS UNIT ID P008

EMISSIONS UNIT DESCRIPTION 300 gallon high speed intermediate mixer and filling station

DATE INSTALLED August 1996

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	attainment	2.55 lbs/hour and 40 lbs/day	7.3	2.55 lbs/hour and 40 lbs/day	7.3
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

**BAT is compliance with applicable rules and specified allowable mass emission rates; daily intermediate production limitation; record keeping; and reporting.**

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

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

**TOXIC AIR CONTAMINANTS**

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

AIR TOXICS MODELING PERFORMED\*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: 1-nitropropane and toluene

**NEW SOURCE REVIEW FORM B**

PTI Number: 08-04055

Facility ID: 0857733184

FACILITY NAME Rubber Seal

FACILITY DESCRIPTION paints and allied products

CITY/TWP Davton

Emissions Unit ID: **P009**

SIC CODE 2851

SCC CODE 4-02-999-98

EMISSIONS UNIT ID P009

EMISSIONS UNIT DESCRIPTION Tank cleanup operations

DATE INSTALLED August 1996

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	attainment	1.2 lb/hour and 28 lbs/day	5.3	1.2 lbs/hour and 28 lbs/day	5.3
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

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

**BAT is compliance with applicable rules and specified allowable mass emission rates; record keeping; and reporting.**IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT?

\$

**TOXIC AIR CONTAMINANTS**

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

AIR TOXICS MODELING PERFORMED\*?

X

YES

NO

IDENTIFY THE AIR CONTAMINANTS:

toluene

PTI Num

FACILITY

Emissions Unit ID: **P009** \_\_\_\_\_FACILITY DESCRIPTION paints and allied productsCITY/TWP Dayton

**Ohio EPA Permit to Install Information Form** Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit **hard copy items to Pam McGraner**, AQM&P, DAPC, Central Office, and electronic files to [airpti@epa.state.oh.us](mailto:airpti@epa.state.oh.us)

Please fill out the following. If the checkbox does not work, replace it with an 'X'

	<u>Electronic</u>	<u>Additional information File Name Convention (your PTI # plus this letter)</u>	<u>Hard Copy</u>	<u>None</u>
<u>Calculations (required)</u>	<input checked="" type="checkbox"/>	0804055c.wpd	<input type="checkbox"/>	
<u>Modeling form/results</u>	<input checked="" type="checkbox"/>	0804055s.wpd	<input type="checkbox"/>	<input type="checkbox"/>
<u>PTI Application (complete or partial)*</u>	<input type="checkbox"/>	0000000a.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>BAT Study</u>	<input type="checkbox"/>	0000000b.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>Other/misc.</u>	<input type="checkbox"/>	0000000t.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>

\* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

### NSR Discussion

Rubber Seal is a coating production facility located in Montgomery County, which is currently designated as attainment for all pollutants. This PTI application is for all of the mixing and cleanup operations at the facility and is being constructed as a synthetic minor to avoid Title V requirements as a result of potential HAP emissions. These mixing units were installed in August 1996. TRI data for the previous years shows that actual HAP emissions were below major source thresholds. Potential emissions are based upon three shifts of operation, while Rubber Seal currently only operates one shift. The applicable rule for each of the emissions units is OAC rule 3745-21-07(G)(2).

Emissions units P001 through P004 produce clear coatings. Allowable emissions for each of these units are established at 1 lb/hour, 24 lbs/day and 4.38 TPY OC. The hourly allowable emission rate is reflective of the potential to emit for these mixers based upon the maximum capacity of the mixer and the clear coat with the highest OC content. Compliance with the daily and annual allowable emission rates are based upon monthly record keeping of the clear coat produced and the OC contents of each coating. Due to the daily allowable emission rate being reflective of the potential to emit as well as the hourly, it is appropriate to only require monthly record keeping and a calculation of the average daily emission rate. The loss factor of 0.2% from these mixers is based upon facility mass balance testing. BAT is compliance with applicable rules and specified allowable mass emission rates; record keeping; and reporting.

Emissions unit P005 is a primer mixer with allowable emissions at 2.45 lbs/hour, 40 lbs/day and 7.3 TPY OC. The hourly allowable emission rate is reflective of the potential to emit for this mixer based upon the maximum capacity of the mixer and the primer with the highest OC content. In order to ensure compliance with the daily allowable emission rate of 40 lbs/day, primer production on this emissions unit is restricted to 816 gallons/day. The permittee shall maintain daily records of the primer production rate and OC contents for the calculation of daily and annual OC emission rates. The solvent loss factor of 1% is from AP-42 Section 6.4.1 (1/95). BAT is compliance with applicable rules and

**104 NEW SOURCE REVIEW FORM B**

PTI Number: 08-04055

Facility ID: 0857733184

FACILITY NAME Rubber Seal

FACILITY DESCRIPTION Paints and allied products

CITY/TWP Davton

Emissions Unit ID: **P009**

specified allowable mass emission rates; daily primer production limitation; record keeping; and reporting.

Emissions unit P006 is also a primer mixer with allowable emissions at 1.63 lbs/hour, 40 lbs/day and 7.3 TPY OC. The hourly allowable emission rate is reflective of the potential to emit for this mixer based upon the maximum capacity of the mixer and the primer with the highest OC content. The permittee shall maintain daily records of the primer production rate and OC contents for the calculation of daily and annual OC emission rates. The solvent loss factor of 1% is from AP-42 Section 6.4.1 (1/95). BAT is compliance with applicable rules and specified allowable mass emission rates; record keeping; and reporting.

Emissions unit P007 is an undercoat mixer with allowable emissions at 1.64 lbs/hour, 40 lbs/day and 7.3 TPY OC. The hourly allowable emission rate is reflective of the potential to emit for this mixer based upon the maximum capacity of the mixer and the undercoat with the highest OC content. The permittee shall maintain daily records of the undercoat production rate and OC contents for the calculation of daily and annual OC emission rates. The solvent loss factor of 1% is from AP-42 Section 6.4.1 (1/95). BAT is compliance with applicable rules and specified allowable mass emission rates; record keeping; and reporting.

Emissions unit P008 is an intermediates mixer with allowable emissions at 2.55 lbs/hour, 40 lbs/day and 7.3 TPY OC. The hourly allowable emission rate is reflective of the potential to emit for this mixer based upon the maximum capacity of the mixer and the intermediate with the highest OC content. In order to ensure compliance with the daily allowable emission rate of 40 lbs/day, intermediate production on this emissions unit is restricted to 588 gallons/day. The permittee shall maintain daily records of the intermediate production rate and OC contents for the calculation of daily and annual OC emission rates. The solvent loss factor of 1% is from AP-42 Section 6.4.1 (1/95). BAT is compliance with applicable rules and specified allowable mass emission rates; daily intermediate production limitation; record keeping; and reporting.

Emissions unit P009 is for the cleanup operations. Cleanup solvent (toluene) is placed in the tanks to remove any residual in the mix tank prior to mixing a new coating. The solvent used is taken from a drum and used in all of the tanks. The same solvent is reused until it is no longer effective at cleaning the tanks and is then sent off-site for recycling and disposal. Therefore, it is not possible to attribute cleanup emissions to each mix tank individually and a separate emissions unit accounts for the cleanup operations for all emissions units at the facility. The applicable rule is OAC rule 3745-21-07(G)(2). Allowable emissions are established at 1.2 lbs/hour, 28 lbs/day, and 5.3 TPY OC. The hourly allowable emission rate is reflective of the potential to emit based upon a maximum hourly cleanup usage of 4 gallons multiplied by the maximum OC content of the cleanup solvents. Monthly records are maintained of the total cleanup solvent used minus the cleanup solvent recovered for recycling and disposal, for the calculation of monthly and daily average OC emissions from cleanup operations. The solvent loss factor of 4% is based upon facility testing and mass balance information. BAT is compliance with applicable rules and specified allowable mass emission rates; record keeping; and reporting.

Each of the emissions units is subject to the Ohio EPA Air Toxics Policy. All of the emissions units vent out a common stack. The modeled emission rate of 1.547 g/second is the sum of the hourly allowable emission rates of the emissions units. The maximum modeled concentration is 2387 ug/m<sup>3</sup>. This model demonstrates compliance with the MAGLC

**NEW SOURCE REVIEW FORM B**

PTI Number: 08-04055

Facility ID: 0857733184

FACILITY NAME Rubber Seal

FACILITY DESCRIPTION paints and allied products

CITY/TWP Davton

Emissions Unit ID: **P009**

(TLV/42) for all toxics with the exception of styrene, 2-diethylaminoethanol, and 1-nitropropane. Styrene is emitted from emissions units P001, P002, P003, P004, P005, and P006. The sum of the maximum styrene emissions from all six emissions units combined (0.0215 g/sec) was modeled and demonstrates compliance with a maximum modeled concentration of 33.17 ug/m<sup>3</sup> which is much lower than the MAGLC of 2023 ug/m<sup>3</sup>. 2-diethylaminoethanol is emitted from emissions units P001 through P004. The sum of the 2-diethylaminoethanol emissions from emissions units P001, P002, P003, and P004 combined (0.0025 g/sec) was modeled and demonstrates compliance with a maximum modeled concentration of 3.857 ug/m<sup>3</sup> which is much lower than the MAGLC of 228.6 ug/m<sup>3</sup>. 1-nitropropane is emitted from emissions unit P008. The maximum 1-nitropropane emissions (0.3178 g/sec) were modeled and demonstrates compliance with a maximum modeled concentration of 490.3 ug/m<sup>3</sup> which is much lower than the MAGLC of 2170 ug/m<sup>3</sup>. **Compliance was demonstrated through Screen 3 modeling based upon the worst case toxic emissions from each emissions unit.**

Additionally, this PTI is being written as a synthetic minor for hazardous air pollutants. The potential HAP emissions are 24.09 TPY toluene and 10.9 TPY xylene, both of which exceed the threshold of 10 TPY for any individual HAP; and potential emissions of total combined HAP are 37.26 TPY, which exceeds the threshold of 25 TPY for any combination of HAPs. In order to restrict potential emissions below Title V major source threshold, the facility has accepted facility wide HAP emission limitations of 9.9 tons of any individual HAP, as a rolling, 12-month summation and 24.9 tons of total HAPs, as a rolling, 12-month summation, from all of the emissions units at the facility. To ensure enforceability during the first twelve months, the permittee has accepted cumulative emission limitations on the individual and total HAP emission rates for the first twelve months following issuance of this permit. The permittee shall maintain monthly records of the HAP emissions and submit quarterly deviation reports identifying any exceedances of the rolling, 12-month limitations. The permittee shall also submit annual reports of the individual and total combined HAP emission rates from all emissions units at the facility.

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

Synthetic Minor Determination and/or  Netting Determination  
Permit To Install 08-04055

- A. **Source Description:** This facility is a manufacturer of coatings. Emissions units P001 through P004 are clear coating mixers, P005 and P006 manufacture primers, P007 is an undercoat mixer, P008 is an intermediate mixer, and emissions unit P009 is the tank cleanup operations.
- B. **Facility Emissions and Attainment Status:** Rubber Seal is located in Montgomery County, which is currently designated as attainment for all pollutants. Rubber Seal has potential HAP emissions greater than the major source thresholds for individual and total combined HAPs.
- C. **Source Emissions:** Potential HAP emissions are 24.09 TPY toluene, 10.9 TPY xylene, and 37.26 TPY total combined HAPs. In order to restrict potential HAP emissions, the permittee has accepted a facility wide limitation of 9.9 tons of any individual HAP, as a rolling, 12-month summation and 24.9 tons of total

106 **NEW SOURCE REVIEW FORM B**

PTI Number: 08-04055

Facility ID: 0857733184

FACILITY NAME Rubber Seal

FACILITY DESCRIPTION paints and allied products

CITY/TWP Davton

Emissions Unit ID: **P009**

HAPs, as a rolling, 12-month summation, from all emissions units at the facility. To ensure enforceability during the first twelve months of operation following issuance of this permit, cumulative emission limitations have been established for individual HAPs and total combined HAPs. After the first twelve months of operation following issuance of this permit, the HAP emission rates shall demonstrate compliance on a rolling, 12-month basis. In order to demonstrate compliance with these limitations, the permittee shall maintain monthly records of the individual HAP emission rates for each HAP as well as the total HAP emission rates from all emissions units at the facility. Quarterly deviation reports shall be submitted to identify any exceedances of the HAP emission limitations as well as annual reports of the HAP emissions for the calendar year.

- D. **Conclusion:** The monthly records of the HAP emissions, for each individual HAP and for the total combined HAPs, will ensure compliance with facility wide HAP emission limitations ensuring that potential HAP emissions are less than the major source thresholds.

**PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:**

NONE

Please complete:

**SUMMARY (for informational purposes only)**

**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
organic compounds	52.02
individual HAPs	9.9
total combined HAPs	24.9