

Synthetic Minor Determination and/or Netting Determination

Permit To Install 08-04524

A. Source Description

Dynamic Plastics Inc., is located in New Paris, Ohio in Preble County. Emission sources K001, K002 and K003 are spray booths that coat molded plastic parts with a catalyzed resin and non-VOC fiberglass material.

B. Facility Emissions and Attainment Status

Changes in emissions factors result in a decrease in the actual organic compound emissions for each of three sources. This PTI modification is to incorporate updated emission factors published by the Composite Fabricators Association, and to raise the material usage limitations which will result in an increase of emissions for two sources (K001 and K002) and a decrease for one (K003). It will be a synthetic minor to limit the OC emissions, which is nearly all styrene (HAP), to less than 10 TPY for the facility. This will not trigger Title V review and will avoid any MACT requirements. Based on the OAC rule 3745-21-07 (G)(2), the potential to emit organic compound emissions for this facility is 21.9 TPY (3 x 7.3 TPY). Preble County is currently designated as attainment for all criteria pollutants.

C. Source Emissions

All three booths, K001, K002 and K003, are subject to OAC rule 3745-21(G)(2) which limits each to 8 lb-OC/hour and 40 lb-OC/day. For the purpose of BAT, the allowable emissions are further limited to keep the total OC, and therefore the HAP (styrene) PTE under 10 TPY for a single HAP.

D. Conclusion

By establishing material usage restrictions, and implementing monitoring and record keeping requirements, the permittee will avoid the Title V permitting requirements. Therefore, facility emission rates are below the Title V thresholds and do not trigger a Title V permit or MACT requirements.



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
PREBLE COUNTY**

CERTIFIED MAIL

Application No: 08-04524

DATE: 11/25/2003

Dynamic Plastics Inc
Paul Hemker
8207 State Rte 121
New Paris, OH 45347-9222

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 **\$600** 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,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

RAPCA

Toledo Metro Area Council of Gov.

KY

IN

PREBLE COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 08-04524 FOR AN AIR CONTAMINANT SOURCE FOR
DYNAMIC PLASTICS INC**

On 11/25/2003 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Dynamic Plastics Inc**, located at **8207 State Rte 121, New Paris**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 08-04524:

modification of K001, K002, K003 to increase emissions, chapter 31 replacing 08-03852 issued 4-7-99.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

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



**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 08-04524

Application Number: 08-04524
APS Premise Number: 0868070055
Permit Fee: **To be entered upon final issuance**
Name of Facility: Dynamic Plastics Inc
Person to Contact: Paul Hemker
Address: 8207 State Rte 121
New Paris, OH 45347-9222

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

**8207 State Rte 121
New Paris, Ohio**

Description of proposed emissions unit(s):

Modification of K001, K002, K003 to increase emissions, chapter 31 replacing 08-03852 issued 4-7-99.

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

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any

information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions

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and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

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

12. Best Available Technology

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

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Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) 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	5.45

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>
K001 - Fiberglass resin spray booth (gel coat and mechanical non-atomized).	OAC rule 3745-31-05(A)(3)	The organic compound (OC) emissions from this emissions unit shall not exceed 2.02 lbs/hr and 16.16 lbs/day, excluding cleanup.
*Modification		The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07 (B).
	OAC rule 3745-35-07(B) Synthetic Minor to Avoid Title V Permitting	The annual OC emission rate shall not exceed 2.10 TPY, excluding cleanup, on a 12-month rolling basis.
	OAC rule 3745-21-07(G)(2)	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 2.03 lb-OC/hr limitations was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
- 2.b Cleanup operations associated with each emissions unit K001, K002, and K003 are performed at and accounted for in emissions unit source K002. Therefore, recordkeeping or reporting requirements for cleanup operations are not required for this emissions unit.

Dynar

PTI A

Issued: To be entered upon final issuance

Emissions Unit ID: **K001**

B. Operational Restrictions

1. The resin use in this emissions unit shall not exceed 28.93 tons per year, based on a rolling 12-month summation. The permittee shall use the historical monthly records being maintained in accordance with PTI 08-3852 issued April 7, 1999.
2. The styrene in the resins applied in this emissions unit shall not exceed the following concentrations:

	<u>styrene concentration</u> <u>(% by weight)</u>
Resin - gel coat operations:	36%
Resin - mechanical non-atomized spray up operations:	45%

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month, for each resin and catalyst employed in this emissions unit:
 - a. The name and identification for each material employed.
 - b. The total number of gallons of each resin and catalyst material employed.
 - c. The organic compound content of each resin and catalyst material employed, in pounds per gallon.
 - d. The method of application for each resin employed.
 - e. The styrene content of each resin employed, in percent by weight.
 - f. The rolling, 12 month summation of the resin usage rates, in tons.
 - g. The total organic compound emissions from all resins and catalysts employed, in pounds (see calculation methodology in Section E.1.b.).
 - h. The total number of days the emissions unit was in operation.

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PTI A

Emissions Unit ID: **K001**

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- i. The average daily organic compound emission rate, in pounds per day (i.e., (g)/(h))

Issued: To be entered upon final issuance

2. The permit to install for this emissions unit K001 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, for K001, K002 and K003 combined. 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): 170.40

Maximum Hourly Emission Rate (lbs/hr): 5.24

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 1574

MAGLC (ug/m³): 1704

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.
- 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".
 - c. Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of:
 - a. Each month that the average daily organic compound emissions from the resin and catalyst use exceeded 16.16 pounds per day, and the actual average daily organic compound emissions for each such day.
 - b. Each month that the 12 month rolling summation of resin usage exceeds 28.93 tons.
 - c. Any resins applied in this emissions unit with a styrene concentration that exceeds 36% by weight when performing gel coat operations, or 45% by weight when performing spray up operations.

The quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation -
2.02 lbs/hour organic compounds, including cleanup

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PTI A

Issued: To be entered upon final issuance

Emissions Unit ID: **K001**

Applicable Compliance Method -
Compliance shall be determined as follows:

- i. The usage rate for each resin (in pounds per hour) shall be divided by 2000 pounds per ton. The usage rate of each resin, in tons per hour, shall then be multiplied by the appropriate emission factor (260 lbs styrene per ton of resin when performing gel coat operations for resins with 36% styrene concentration by weight, or 108 lbs styrene per ton of resin when performing spray up operations for resins with 45% styrene concentration by weight) from Table 3 of the Engineering Environmental Consulting Services document, Technical Discussion of the Unified Emission Factors for Open Molding of Composites, July 23, 2001, released on behalf of the Composite Fiberglass Association.
 - ii. The usage rate for each resin (in pounds per hour) shall be divided by the density of the resin (8.5 lb/gal-resin). The usage rate of each resin, in gallons per hour, shall then be multiplied by 1% to determine the usage rate of the catalyst MEKP (in gallons per hour) and then multiplied by the maximum organic compound content of the catalyst, in pounds per gallon.
 - iii. The total hourly organic compound emission rate (in pounds per hour) shall then be the sum of the results from i and ii above.
- b. Emission Limitation -
16.16 lbs/day organic compounds, including cleanup

Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in Section C.1. and shall be determined as follows:

- i. The usage of each resin (gallons per month), as required to be recorded in Section C.1., shall be multiplied by the resin density, in pounds per gallon, and then divided by 2,000 pounds per ton. The usage of each resin, in tons, shall then be multiplied by the appropriate emission factor (260 lbs styrene per ton of resin when performing gel coat operations for resins with 36% styrene concentration by weight, or 108 lbs styrene per ton of resin when performing spray up operations for resins with 45% styrene concentration by weight) from Table 3 of the Engineering Environmental Consulting Services document, Technical Discussion of the Unified Emission Factors for Open Molding of Composites, July 23, 2001, released on behalf of the Composite Fiberglass Association.

Emissions Unit ID: **K001**

- ii. The total usage of the catalyst (gallons per month), as required to be recorded in Section C.1., shall be multiplied by the maximum organic compound content of the catalyst, in pounds per gallon.
- iii. The total daily organic compound emission rate (in pounds per day) shall then be the sum of the results from i and ii above, divided by the total number of days the emissions unit was in operation for the month.

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PTI A

Emissions Unit ID: **K001**

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- c. Emission Limitation -
2.10 TPY OC, including cleanup, as a rolling 12-month summation

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.1. and the calculation methodology in E.1.b.i - iii, and this shall be the rolling summation of the monthly organic compound emission rates for the previous 12 months, divided by 2,000 pounds per ton.

F. Miscellaneous Requirements

1. The terms and conditions in sections A, B, C, D, and E of this permit are federally enforceable, pursuant to OAC rule 3745-35-07.
2. This PTI is a modification to update the emission factors and increase the resin usage. The terms and conditions of this PTI will supercede those in PTI 08-3852 issued April 7, 1999. This modification represents an increase in emissions of 1.66 TPY OC for K001, and 1.57 TPY OC for K002, and a decrease in emissions of 3.29 TPY OC for K003.

Dynamic Plastics Inc
PTI A
Issued

Facility ID: 0868070055

Emissions Unit ID: **K002**

- 2.b** Cleanup operations associated with each emissions unit K001, K002, and K003 are performed at and accounted for in emissions unit source K002. Therefore, recordkeeping or reporting requirements for cleanup operations are required for this emissions unit.

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PTI A

Emissions Unit ID: **K002**

Issued: To be entered upon final issuance

B. Operational Restrictions

1. The resin use in this emissions unit shall not exceed 30.88 tons per year, based on a rolling 12-month summation. The permittee shall use the historical monthly records being maintained in accordance with PTI 08-3852 issued April 7, 1999.
2. The styrene in the resins applied in this emissions unit shall not exceed 31% by weight.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month, for each resin and catalyst employed in this emissions unit:
 - a. The name and identification for each material employed.
 - b. The total number of gallons of each resin, catalyst and cleanup material employed.
 - c. The organic compound content of each resin, catalyst and cleanup material employed, in pounds per gallon.
 - d. The method of application for each resin employed.
 - e. The styrene content of each resin employed, in percent by weight.
 - f. The rolling, 12 month summation of the resin usage rates, in tons.
 - g. The total organic compound emissions from all resins, catalysts and cleanup employed, in pounds (see calculation methodology in Section E.1.b.).
 - h. The total number of days the emissions unit was in operation.
 - i. The average daily organic compound emission rate, in pounds per day (i.e., (g)/(h))
2. The permit to install for this emissions unit K002 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, for K001, K002 and K003 combined. 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).

Dynar

PTI A

Emissions Unit ID: **K002**

Issued: To be entered upon final issuance

The following summarizes the results of the modeling for the "worst case" pollutant(s):

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PTI A

Emissions Unit ID: **K002**

Issued: To be entered upon final issuance

Pollutant: Styrene

TLV (mg/m³): 170.40

Maximum Hourly Emission Rate (lbs/hr): 5.24

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 1574

MAGLC (ug/m³): 1704

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.
- 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:"

Dynamic Plastics Inc
PTI A
Issued

Facility ID: 0868070055

Emissions Unit ID: **K002**

- a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.).

Dynar

PTI A

Emissions Unit ID: **K002**

Issued: To be entered upon final issuance

- b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy".
- c. Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of:
 - a. Each month that the average daily organic compound emissions from the resin and catalyst use exceeded 15.44 pounds per day, and the actual average daily organic compound emissions for each such day.
 - b. Each month that the 12 month rolling summation of resin usage exceeds 30.88 tons.
 - c. Any resins applied in this emissions unit with a styrene concentration that exceeds 31% by weight.

The quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation -
1.93 lbs/hour organic compounds, including cleanup

Applicable Compliance Method -
Compliance shall be determined as follows:
 - i. The usage rate for each resin (in pounds per hour) shall be divided by 2000 pounds per ton. The usage rate of each resin, in tons per hour, shall then be multiplied by the appropriate emission factor (66 lbs styrene per ton of resin for resins with 31% styrene concentration by weight) from Table 3 of the Engineering Environmental Consulting Services document, Technical Discussion of the Unified Emission Factors for Open Molding of Composites, July 23, 2001, released on behalf of the Composite Fiberglass Association.

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ii The usage rate for each resin (in pounds per hour) shall be divided by the density of the resin (8.5 lb/gal-resin). The usage rate of each resin, in gallons per hour, shall then be multiplied by 1% to determine the usage rate of the catalyst MEKP (in

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gallons per hour) and then multiplied by the maximum organic compound content of the catalyst, in pounds per gallon.

- iii. The total usage of the cleanup material (gallons per hour) shall be multiplied by the maximum organic compound content of the cleanup material, in pounds per gallon.
- iv. The total hourly organic compound emission rate (in pounds per hour) shall then be the sum of the results from i, ii and iii above.

- b. Emission Limitation -
15.44 lbs/day organic compounds, including cleanup

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in Section C.1. and shall be determined as follows:

- i. The usage of each resin (gallons per month), as required to be recorded in Section C.1., shall be multiplied by the resin density, in pounds per gallon, and then divided by 2,000 pounds per ton. The usage of each resin, in tons, shall then be multiplied by the appropriate emission factor (66 lbs styrene per ton of resin for resins with 31% styrene concentration by weight) from Table 3 of the Engineering Environmental Consulting Services document, Technical Discussion of the Unified Emission Factors for Open Molding of Composites, July 23, 2001, released on behalf of the Composite Fiberglass Association.
- ii. The total usage of the catalyst (gallons per month), as required to be recorded in Section C.1., shall be multiplied by the maximum organic compound content of the catalyst, in pounds per gallon.
- iii. The total usage of the cleanup material (gallons per month), as required to be recorded in Section C.1., shall be multiplied by the maximum organic compound content of the cleanup material, in pounds per gallon.
- iv. The total daily organic compound emission rate (in pounds per day) shall then be the sum of the results from i, ii and iii above, divided by the total number of days the emissions unit was in operation for the month.

- c. Emission Limitation -
2.01 TPY OC, including cleanup, as a rolling 12-month summation

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.1. and the calculation methodology in E.1.b.i.- iv., and this shall be the rolling summation of the monthly organic compound emission rates for the previous 12 months, divided by 2,000 pounds per ton.

F. Miscellaneous Requirements

1. The terms and conditions in sections A, B, C, D, and E of this permit are federally enforceable, pursuant to OAC rule 3745-35-07.
2. This PTI is a modification to update the emission factors and increase the resin usage. The terms and conditions of this PTI will supercede those in PTI 08-3852 issued April 7, 1999. This modification represents an increase in emissions of 1.66 TPY OC for K001, and 1.57 TPY OC for K002, and a decrease in emissions of 3.29 TPY OC for K003.

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K003 - Fiberglass resin spray booth (mechanical atomized). * Modification.	OAC rule 3745-31-05(A)(3) OAC rule 3745-35-07(B) Synthetic Minor to Avoid Title V Permitting OAC 3745-21-07(G)(2)	The organic compound (OC) emissions from this emissions unit shall not exceed 1.29 lbs/hr and 10.31 lbs/day, excluding cleanup. The requirements of this rule also include compliance with the requirements of OAC 3745-35-07(B). The annual OC emission rate shall not exceed 1.34 TPY, excluding cleanup, on a 12-month rolling basis. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-02(A)(3).

2. Additional Terms and Conditions

- 2.a The 1.29 lb-OC/hr limitations were established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

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- 2.b** Cleanup operations associated with each emissions unit K001, K002, and K003 are performed at and accounted for in emissions unit source K002. Therefore, recordkeeping or reporting requirements for cleanup operations are not required for this emissions unit.

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B. Operational Restrictions

1. The resin use in this emissions unit shall not exceed 21.13 tons per year, based on a rolling 12-month summation. The permittee shall use the historical monthly records being maintained in accordance with PTI 08-3852 issued April 7, 1999.
2. The styrene in the resins applied in this emissions unit shall not exceed 31% by weight.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month, for each resin and catalyst employed in this emissions unit:
 - a. The name and identification for each material employed.
 - b. The total number of gallons of each resin and catalyst material employed.
 - c. The organic compound content of each resin and catalyst material employed, in pounds per gallon.
 - d. The method of application for each resin employed.
 - e. The styrene content of each resin employed, in percent by weight.
 - f. The rolling, 12 month summation of the resin usage rates, in tons.
 - g. The total organic compound emissions from all resins and catalysts employed, in pounds (see calculation methodology in Section E.1.b.).
 - h. The total number of days the emissions unit was in operation.
 - i. The average daily organic compound emission rate, in pounds per day (i.e., (g)/(h))
2. The permit to install for this emissions unit K003 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, for K001, K002 and K003 combined. 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).

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Emissions Unit ID: **K003**

The following summarizes the results of the modeling for the "worst case" pollutant(s):

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Pollutant: Styrene

TLV (mg/m³): 170.40

Maximum Hourly Emission Rate (lbs/hr): 5.24

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 1574

MAGLC (ug/m³): 1704

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.
- 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:"

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- a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.).

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- b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy".
- c. Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include an identification of:
 - a. Each month that the average daily organic compound emissions from the resin and catalyst use exceeded 10.31 pounds per day, and the actual average daily organic compound emissions for each such day.
 - b. Each month that the 12 month rolling summation of resin usage exceeds 21.13 tons.
 - c. Any resins applied in this emissions unit with a styrene concentration that exceeds 31% by weight.

The quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation -
1.29 lbs/hour organic compounds, including cleanup

Applicable Compliance Method -
Compliance shall be determined as follows:
 - i. The usage rate for each resin (in pounds per hour) shall be divided by 2000 pounds per ton. The usage rate of each resin, in tons per hour, shall then be multiplied by the appropriate emission factor (105 lbs styrene per ton of resin for resins with 31% styrene concentration by weight) from Table 3 of the Engineering Environmental Consulting Services document, Technical Discussion of the Unified Emission Factors for Open Molding of Composites, July 23, 2001, released on behalf of the Composite Fiberglass Association.

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ii The usage rate for each resin (in pounds per hour) shall be divided by the density of the resin (8.5 lb/gal-resin). The usage rate of each resin, in gallons per hour, shall then be multiplied by 1% to determine the usage rate of the catalyst MEKP (in

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gallons per hour) and then multiplied by the maximum organic compound content of the catalyst, in pounds per gallon.

- iii. The total hourly organic compound emission rate (in pounds per hour) shall then be the sum of the results from i and ii above.

- b. Emission Limitation -
10.31 lbs/day organic compounds, including cleanup

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in Section C.1. and shall be determined as follows:

- i. The usage of each resin (gallons per month), as required to be recorded in Section C.1., shall be multiplied by the resin density, in pounds per gallon, and then divided by 2,000 pounds per ton. The usage of each resin, in tons, shall then be multiplied by the appropriate emission factor (105 lbs styrene per ton of resin for resins with 31% styrene concentration by weight) from Table 3 of the Engineering Environmental Consulting Services document, Technical Discussion of the Unified Emission Factors for Open Molding of Composites, July 23, 2001, released on behalf of the Composite Fiberglass Association.
- ii. The total usage of the catalyst (gallons per month), as required to be recorded in Section C.1., shall be multiplied by the maximum organic compound content of the catalyst, in pounds per gallon.
- iii. The total daily organic compound emission rate (in pounds per day) shall then be the sum of the results from i. and ii above, divided by the total number of days the emissions unit was in operation for the month.

- c. Emission Limitation -
1.34 TPY OC, including cleanup, as a rolling 12-month summation

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in C.1. and the calculation methodology in E.1.b.i.- iii., and this shall be the rolling summation of the monthly organic compound emission rates for the previous 12 months, divided by 2,000 pounds per ton.

F. Miscellaneous Requirements

- 1. The terms and conditions in sections A, B, C, D, and E of this permit are federally enforceable,

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pursuant to OAC rule 3745-35-07.

Emissions Unit ID: **K003**

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2. This PTI is a modification to update the emission factors and increase the resin usage. The terms and conditions of this PTI will supercede those in PTI 08-3852 issued April 7, 1999. This modification represents an increase in emissions of 1.66 TPY OC for K001, and 1.57 TPY OC for K002, and a decrease in emissions of 3.29 TPY OC for K003.