



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL  
CUYAHOGA COUNTY**

**CERTIFIED MAIL**

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 13-03924**

**DATE: 4/16/2002**

Alcon Industries  
Gary Calhoun  
7990 Baker Avenue  
Cleveland, OH 44102

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
236 East Town Street, Room 300  
Columbus, Ohio 43215

Very truly yours,

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

cc: USEPA

CBAPC



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**Permit To Install  
Terms and Conditions**

**Issue Date: 4/16/2002  
Effective Date: 4/16/2002**

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**FINAL PERMIT TO INSTALL 13-03924**

Application Number: 13-03924  
APS Premise Number: 1318007755  
Permit Fee: **\$1600**  
Name of Facility: Alcon Industries  
Person to Contact: Gary Calhoun  
Address: 7990 Baker Avenue  
Cleveland, OH 44102

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**7900 Baker Avenue  
Cleveland, Ohio**

Description of proposed emissions unit(s):  
**Gaylord 30 and Gaylord 60 sand mixers to form sand cores -- P003 and P004.**

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 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 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

**Alcon Industries**  
**PTI Application: 13-03924**  
**Issued: 4/16/2002**

**Facility ID: 1318007755**

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 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**

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

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**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>
VOC	14.6
PE	20.2

**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>
P003 - Gaylord SATB-30, enclosed semi-automatic isocure core forming machine	OAC rule 3745-31-05(A)(3)	VOC, 7.3 TPY (see section A.2.a) best available control measures shall be used to minimize or eliminate volatile organic emissions.
		10.1 TPY PE
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), 3745-21-07(G)(2), and OAC rule 3745-17-11(B)
		See A.2.c.
	OAC rule 3745-21-07 (G)(2)	See A.2.a.
	OAC rule 3745-17-11 (B)	PE emissions shall be less than 2.7 lbs/hr (see Section A.2.b).
	OAC rule 3745-17-07 (A)(1)	Visible PE from any stack serving this emissions unit shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

**2. Additional Terms and Conditions**

- 2.a** This emissions unit shall not discharge more than forty, 40, pounds of organic material into the atmosphere in any one day, nor more than eight, 8, pounds of organic material in any one hour.
- 2.b** The uncontrolled mass rate of particulate emissions from this emission unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Based on Table I of OAC rule 3745-17-11, the allowable PE limitation is 2.7 pounds per hour for this emissions unit.
- 2.c** Maximum resin usage shall not exceed 1.82% based on sand, and maximum Methyl Formate binder shall not exceed 155% based on resin

**B. Operational Restrictions**

None.

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

- 1. The permittee shall collect and record the following information each day when operating this emissions unit:
  - a. number of sand cores produced by this emissions unit;
  - b. the amount, in pounds, of sand used during each cycle;
  - c. the amount, in pounds, of resin used during each cycle;
  - d. the amount, in pounds, of binder catalyst used during each cycle;
  - e. the number of hours of operation for each cycle;
  - f. the total number of cycles performed for each day;
  - g. the total organic compound emission rate from all binders and resins, in pounds per day, calculated in accordance with section E.1.e; and
  - h. the average hourly organic compound emission rate for all binders and resins, in pounds per hour, calculated in accordance with section E.1.e.
- 2. The permittee shall collect and record the amount, in pounds, of binder catalyst (Methyl Formate)

purchased on a monthly basis for the purpose of determining annual emissions.

3. The permit to install for this emissions unit P003 was evaluated based on the actual materials (resins and binder catalyst) 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. 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: Methyl Formate

TLV (mg/m<sup>3</sup>): 100

Maximum Hourly Emission Rate (lbs/hr): 16

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 1006

MAGLC (ug/m<sup>3</sup>): 2381

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 (resins or binder catalyst), 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 OhioEPA 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 notify the director (appropriate District Office or local air agency) in writing of any daily record showing that this emissions unit emits more than eight, 8, pounds of organic compounds per hour. This notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any daily record showing that this emissions unit exceeds the daily OC limit (40 pounds per day). This notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 45 days after the exceedance occurs.
3. The permittee shall submit to the director (appropriate District Office or local air agency) an annual OC emissions report. This report shall be submitted no later than the end of the first quarter following the previous calendar year.

4. The permittee shall submit to the director (appropriate District Office or local air agency) a semiannual written report which (a) identifies all days during which any visible PE from any stack serving this emissions unit, and (b) describe any corrective actions taken to eliminate the visible emissions. These reports shall be submitted May 15 and November 15 of each year and shall cover the previous calendar period.

#### **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 methods:

- a. Visible Emission Limit:

Visible particulate emissions from any stack serving this emissions unit shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through visible emission readings performed in accordance with Method 9 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC 3745-17-03(B)(1).

- b. Emission Limit:

2.7 pound of PE/hour and 10.1 TPY PE

Applicable Compliance Method:

If required, compliance with the above hourly PE limitation shall be determined by the method specified in OAC rule 3745-17-03(B)(10). Provided compliance is demonstrated with the hourly limit, the annual emissions shall be determined by multiplying the actual hourly emission rate by the actual annual hours of operation and dividing by 2000 lbs / ton.

- c. Emission Limit:

7.3 TPY of organic compounds (Methyl Formate)

Applicable Compliance Method:

Compliance with the above organic compound emissions limitation shall be determined using the records obtained in section C, "Monitoring and/or Recordkeeping Requirements" of this document and calculated using the following equation:

$$[\text{MeF purchased in lbs/yr}] * [(0.85 \text{ lbs MeF emitted}) / (1 \text{ lb MeF purchased})] * [1 \text{ ton} / 2000 \text{ lbs}]$$

Where 15 percent of MeF is bound during core forming reaction and 85 percent of MeF is released to the atmosphere.

- d. Emission Limit:  
 Organic compound (Methyl Formate) emissions shall not exceed 8 lbs/hour and 40 lbs/day, unless the OC emissions are reduced by at least 85 percent.

**Applicable Compliance Method:**

If required, compliance with the above hourly organic compound emissions limitation shall be determined using Methods 25 or 25A of 40 CFR, Part 60, Appendix A. If a control device is used, compliance with the above reduction requirement shall be determined by multiplying the fractional capture efficiency by the fractional control efficiency and multiplying by 100 percent. Method 204 of 40 CFR, Part 51, Appendix M shall be used to determine if 100% capture is being achieved. The control efficiency shall be determined using the results of testing performed on the inlet and outlet of the control equipment using Methods 25 or 25A and the following equation:

$$\text{Control efficiency} = [(\text{inlet testing results} - \text{outlet testing results}) / \text{inlet testing results}] * 100\%$$

Otherwise, compliance shall be determined based on the recordkeeping from section C.2. Emissions shall be determined using the following formula:

$$(\# \text{ blows/hr}) * (\text{lbs sand/blow}) * (\# \text{ lbs resin/lb sand}) * (1.55 \text{ lb Methyl Formate/lb resin}) * (0.85) = \text{lbs Methyl Formate / hr}$$

$$(\text{lbs Methyl Formate / hr}) * (\# \text{ hrs operated / day}) = \text{lbs Methyl Formate / day}$$

**F. Miscellaneous Requirements**

None.

**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 - Gaylord SATB-60, enclosed semi-automatic isocure core forming machine	OAC rule 3745-31-05(A)(3)	VOC, 7.3 TPY (see section A.2.a) best available control measures shall be used to minimize or eliminate volatile organic emissions.  10.1 TPY PE  The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), 3745-21-07(G)(2), and OAC rule 3745-17-11(B)  See A.2.c.
	OAC rule 3745-21-07 (G)(2)	See A.2.a.
	OAC rule 3745-17-11 (B)	PE emissions shall be less than 2.7 lbs/hr (see Section A.2.b)
	OAC rule 3745-17-07 (A)(1)	Visible PE from any stack serving this emissions unit shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

**2. Additional Terms and Conditions**

- 2.a** This emissions unit shall not discharge more than forty, 40, pounds of organic material into the atmosphere in any one day, nor more than eight, 8, pounds of organic material in any one hour.
- 2.b** The uncontrolled mass rate of particulate emissions from this emission unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. Based on Table I of OAC rule 3745-17-11, the allowable PE limitation is 2.7 pounds per hour for this emissions unit.
- 2.c** Maximum resin usage shall not exceed 1.82% based on sand, and maximum Methyl Formate binder shall not exceed 155% based on resin

**B. Operational Restrictions**

None.

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

- 1. The permittee shall collect and record the following information each day when operating this emissions unit:
  - a. number of sand cores produced by this emissions unit;
  - b. the amount, in pounds, of sand used during each cycle;
  - c. the amount, in pounds, of resin used during each cycle;
  - d. the amount, in pounds, of binder catalyst used during each cycle.
  - e. the number of hours of operation for each cycle;
  - f. the total number of cycles performed for each day;
  - g. the total organic compound emission rate from all binders and resins, in pounds per day, calculated in accordance with section E.1.e; and
  - h. the average hourly organic compound emission rate for all binders and resins, in pounds per hour, calculated in accordance with section E.1.e.
- 2. The permittee shall collect and record the amount, in pounds, of binder catalyst (Methyl Formate)

purchased on a monthly basis for the purpose of determining annual emissions.

3. The permit to install for this emissions unit P004 was evaluated based on the actual materials (resins and binder catalyst) 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. 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: Methyl Formate

TLV (mg/m<sup>3</sup>): 100

Maximum Hourly Emission Rate (lbs/hr): 16

Predicted 1-Hour Maximum Ground-Level  
Concentration (ug/m<sup>3</sup>): 1006

MAGLC (ug/m<sup>3</sup>): 2381

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 (resins or binder catalyst), 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 OhioEPA 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 notify the director (appropriate District Office or local air agency) in writing of any daily record showing that this emissions unit emits more than eight, 8, pounds of organic compounds per hour. This notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any daily record showing that this emissions unit exceeds the daily OC limit (40 lbs per day). This notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 45 days after the exceedance occurs.
3. The permittee shall submit to the director (appropriate District Office or local air agency) an annual OC emissions report. This report shall be submitted no later than the end of the first quarter following the previous calendar year.

Emissions Unit ID: **P004**

4. The permittee shall submit to the director (appropriate District Office or local air agency) a semiannual written report which (a) identifies all days during which any visible PE from any stack serving this emissions unit, and (b) describe any corrective actions taken to eliminate the visible emissions. These reports shall be submitted May 15 and November 15 of each year and shall cover the previous calendar period.

## **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 methods:

- a. Visible Emission Limit:

Visible particulate emissions from any stack serving this emissions unit shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through visible emission readings performed in accordance with Method 9 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC 3745-17-03(B)(1).

- b. Emission Limit:  
2.7 pound of PE/hour and 10.1 TPY PE

Applicable Compliance Method:

If required, compliance with the above hourly PE limitation shall be determined by the method specified in OAC rule 3745-17-03(B)(10). Provided compliance is demonstrated with the hourly limit, the annual emissions shall be determined by multiplying the actual hourly emission rate by the actual annual hours of operation and dividing by 2000 lbs / ton.

- c. Emission Limit:  
7.3 TPY of organic compounds (Methyl Formate)

Applicable Compliance Method:

Compliance with the above organic compound emissions limitation shall be determined using the records obtained in section C, "Monitoring and/or Recordkeeping Requirements" of this document and calculated using the following equation:

$$[\text{MeF purchased in lbs/yr}] * [(0.85 \text{ lbs MeF emitted}) / (1 \text{ lb MeF purchased})] * [1 \text{ ton} / 2000 \text{ lbs}]$$

Emissions Unit ID: **P004**

Where 15 percent of MeF is bound during core forming reaction and 85 percent of MeF is released to the atmosphere.

- d. Emission Limit:  
 Organic compound (Methyl Formate) emissions shall not exceed 8 lbs/hour and 40 lbs/day, unless the OC emissions are reduced by at least 85 percent.

Applicable Compliance Method:

If required, compliance with the above hourly organic compound emissions limitation shall be determined using Methods 25 or 25A of 40 CFR, Part 60, Appendix A. If a control device is used, compliance with the above reduction requirement shall be determined by multiplying the fractional capture efficiency by the fractional control efficiency and multiplying by 100 percent. Method 204 of 40 CFR, Part 51, Appendix M shall be used to determine if 100% capture is being achieved. The control efficiency shall be determined using the results of testing performed on the inlet and outlet of the control equipment using Methods 25 or 25A and the following equation:

$$\text{Control efficiency} = [(\text{inlet testing results} - \text{outlet testing results}) / \text{inlet testing results}] * 100\%$$

Otherwise, compliance shall be determined based on the recordkeeping from section C.2. Emissions shall be determined using the following formula:

$$(\# \text{ blows/hr}) * (\text{lbs sand/blow}) * (\# \text{ lbs resin/lb sand}) * (1.55 \text{ lb Methyl Formate/lb resin}) * (0.85) = \text{lbs Methyl Formate / hr}$$

$$(\text{lbs Methyl Formate / hr}) * (\# \text{ hrs operated / day}) = \text{lbs Methyl Formate / day}$$

## **F. Miscellaneous Requirements**

None.