

Facility ID: 0829710349 Issuance type: Title V Final Permit

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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Part II - Specific Facility Terms and Conditions

a State and Federally Enforceable Section

1. The following insignificant emissions units are located at this facility:

Z001 - Bottom Grinder 1
 Z002 - Natural Gas-Fired Equipment
 Z003 - Bottom Grinder 2
 Z004 - Bottom Grinder 3
 Z005 - Bottom Grinder 4
 Z006 - Maintenance Parts Washer

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified Permit to Install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the federally-approved versions of OAC Chapters 3745-17, 3745-18, and/or 3745-21.

2. The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 tons/year for any individual HAP and 24.9 tons/year for any combination of HAPs, based on rolling, 12-month summations of the HAP emissions.

[Authority for Term: OAC rule 3745-77-07(A)(1)]

3. The permittee shall collect and record each month the following information for the entire facility:

- a. The individual HAP content for each HAP of each coating material, in pounds of individual HAP per gallon, as applied.
- b. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.
- c. The total combined HAP content of each coating material, in pounds of combined HAPs per gallon, as applied (the sum of all the individual HAP contents from Section A.3.a above).
- d. The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (the sum of all the individual HAP contents from Section A.3.b above).
- e. The total individual HAP emission rate for all the coatings and cleanup materials employed, in tons.
- f. The total combined HAP emission rate for all the coatings and cleanup materials employed, in tons.
- g. The rolling, 12- month total individual HAP emission rate for each HAP employed, in tons.
- h. The rolling, 12-month total combined HAPs emission rate for all the HAPs employed, 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 field office or local agency contact. This information does not have to be kept on a line-by-line basis.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

4. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

- a. An identification of each month during which the rolling, 12-month individual HAP emission rate exceeded 9.9 tons, and the actual rolling, 12-month emission rate for each individual HAP for each such month (for the entire facility).
- b. An identification of each month during which the rolling, 12-month total combined HAP emission rate exceeded 24.9 tons, and the actual rolling, 12-month total combined HAP emission rate for each such month (for the entire facility).

The quarterly deviation reports (excursion) shall be submitted in accordance with General Term and

Condition A.1.c.ii of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

5. The permittee shall submit annual reports that summarize the actual annual emissions of each individual HAP and the combined emissions of all the HAPs for the facility for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for the facility's emissions units in the annual Fee Emission Report.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

6. Compliance with the emission limitations in Section A.2 above shall be determined in accordance with the following methods:

a. Emission Limitation-
9.9 tons for each individual HAP/rolling, 12-month period

Applicable Compliance Method-
Compliance with the annual allowable individual HAP emission limitation above shall be based upon the record keeping requirements specified in Section A.3 above.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

b. Emission Limitation-
24.9 tons for all HAPs combined/rolling, 12-month period

Applicable Compliance Method-
Compliance with the annual allowable combined HAPs emission limitation above shall be based upon the record keeping requirements specified in Section A.3 above.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

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b State Only Enforceable Section

1. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements (as defined in OAC rule 3745-77-01(H) or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

Z008- Finishing Operations

- [Go to Part III for Emissions Unit P003](#)
- [Go to Part III for Emissions Unit P004](#)
- [Go to Part III for Emissions Unit P005](#)
- [Go to Part III for Emissions Unit P006](#)
- [Go to Part III for Emissions Unit P007](#)
- [Go to Part III for Emissions Unit P008](#)
- [Go to Part III for Emissions Unit P014](#)
- [Go to Part III for Emissions Unit P016](#)
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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0829710349 Emissions Unit ID: P003 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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- Plastic Extrusion Coating Line No. 3	OAC rule 3745-31-05(A)(3) PTI 08-04821	The organic compound (OC) emissions from this emissions unit shall not exceed 7.31 lbs/hr (excluding cleanup emissions) and 1.95 tons/yr, including cleanup emissions.
	OAC rule 3745-21-07(G)(9)	None, see section A.I.2.b.

2. Additional Terms and Conditions

- a. The 7.31 lbs OC/hr emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.
- b. This emissions unit currently does not employ photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5). It is, therefore, exempt from all emission limitations and control requirements contained in OAC rule 3745-21-07(G).

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information each month for the coating operation:
 - a. The company identification for each coating and cleanup material employed.
 - b. The OC content of each coating and cleanup material employed, in pounds per gallon.
 - c. The number of gallons of each coating and cleanup employed.
 - d. The total OC emissions for all the coatings and cleanup materials employed, in tons {[summation of b x c] for all cleanup materials + [summation of b x c] for all coatings, divided by 2000 lbs/ton}.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04821]

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IV. **Reporting Requirements**

1. Prior to employing any photochemically reactive material in this emissions unit, the permittee shall provide written notification to the Director (the appropriate Ohio EPA District Office or local air agency). Such notification shall include information sufficient to determine compliance with the emission limits and/or control requirements specified in OAC rule 3745-21-07(G).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04821]

2. The permittee shall submit annual reports that specify the total actual annual OC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04821]

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V. **Testing Requirements**

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

- a. Emission Limitation-
The OC emissions from this emissions unit shall not exceed 7.31 lbs/hr, excluding cleanup.

Applicable Compliance Method-

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

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04821]

- b. Emission Limitation-
The OC emissions from this emissions unit shall not exceed 1.95 tons/yr, including cleanup.

Applicable Compliance Method-

Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements specified in Section A.III.1.d. of this permit, and shall be the sum of the 12 monthly OC emission rates for the calendar year.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04821]

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04821]

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0829710349 Emissions Unit ID: P003 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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- Plastic Extrusion Coating Line No. 3	OAC rule 3745-114-01 and ORC 3704.03(F)	See Sections B.III.1-4 and B.IV.1.

2. Additional Terms and Conditions

1. None

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permit to install for these emissions unit(s) [P003-P008, P014, P016, P020-P022] were evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee in the permit application. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminants emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration results from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compounds emitted from the emissions units, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: Toluene

TLV (mg/m3): 188.8 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 14.74 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 910 ug/m3

MAGLC (ug/m3): 4,495 ug/m3

Toxic Contaminant: Ethylene Glycol

TLV (mg/m3): 100 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 21.31 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,316 ug/m3

MAGLC (ug/m3): 1,755 ug/m3

The permittee, has demonstrated that emissions of [Ethylene Glycol and Toluene], from emissions unit(s) [P003-P008, P014, P016, P020-P022], is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]

2. Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]

3. The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

- b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);

- c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

- d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]

4. The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]

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IV. Reporting Requirements

1. The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0829710349 Emissions Unit ID: P004 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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- Plastic Extrusion Coating Line No. 4	OAC rule 3745-31-05(A)(3) PTI 08-04821	The organic compound (OC) emissions from this emissions unit shall not exceed 7.31 lbs/hr (excluding cleanup emissions) and 1.95 tons/yr, including cleanup emissions.
	OAC rule 3745-21-07(G)(9)	None, see section A.I.2.b.

2. **Additional Terms and Conditions**

- a. The 7.31 lbs OC/hr emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.
- b. This emissions unit currently does not employ photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5). It is, therefore, exempt from all emission limitations and control requirements contained in OAC rule 3745-21-07(G).

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II. **Operational Restrictions**

1. None

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

1. The permittee shall collect and record the following information each month for the coating operation:
 - a. The company identification for each coating and cleanup material employed.
 - b. The OC content of each coating and cleanup material employed, in pounds per gallon.
 - c. The number of gallons of each coating and cleanup employed.
 - d. The total OC emissions for all the coatings and cleanup materials employed, in tons {[summation of b x c] for all cleanup materials + [summation of b x c] for all coatings, divided by 2000 lbs/ton}.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04821]

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IV. Reporting Requirements

1. Prior to employing any photochemically reactive material in this emissions unit, the permittee shall provide written notification to the Director (the appropriate Ohio EPA District Office or local air agency). Such notification shall include information sufficient to determine compliance with the emission limits and/or control requirements specified in OAC rule 3745-21-07(G).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04821]

2. The permittee shall submit annual reports that specify the total actual annual OC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04821]

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V. Testing Requirements

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

- a. Emission Limitation-
The OC emissions from this emissions unit shall not exceed 7.31 lbs/hr, excluding cleanup.

Applicable Compliance Method-

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

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04821]

- b. Emission Limitation-
The OC emissions from this emissions unit shall not exceed 1.95 tons/yr, including cleanup.

Applicable Compliance Method-

Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements specified in Section A.III.1.d. of this permit, and shall be the sum of the 12 monthly OC emission rates for the calendar year.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04821]

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04821]

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0829710349 Emissions Unit ID: P004 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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- Plastic Extrusion Coating Line No. 4	OAC rule 3745-114-01 and ORC 3704.03(F)	See Sections B.III.1-4 and B.IV.1.

2. Additional Terms and Conditions

1. None

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permit to install for these emissions unit(s) [P003-P008, P014, P016, P020-P022] were evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee in the permit application. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminants emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration results from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compounds emitted from the emissions units, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: Toluene

TLV (mg/m3): 188.8 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 14.74 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 910 ug/m3

MAGLC (ug/m3): 4,495 ug/m3

Toxic Contaminant: Ethylene Glycol

TLV (mg/m3): 100 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 21.31 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,316 ug/m3

MAGLC (ug/m3): 1,755 ug/m3

The permittee, has demonstrated that emissions of [Ethylene Glycol and Toluene], from emissions unit(s) [P003-P008, P014, P016, P020-P022], is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]

2. Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
 - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]

3. The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]

4. The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]

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IV. Reporting Requirements

1. The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]

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V. Testing Requirements

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0829710349 Emissions Unit ID: P005 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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- Plastic Extrusion Coating Line No. 5	OAC rule 3745-31-05(A)(3) PTI 08-04821	The organic compound (OC) emissions from this emissions unit shall not exceed 7.31 lbs/hr (excluding cleanup emissions) and 1.95 tons/yr, including cleanup emissions.
	OAC rule 3745-21-07(G)(9)	None, see section A.I.2.b.

2. **Additional Terms and Conditions**

- a. The 7.31 lbs OC/hr emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.
- b. This emissions unit currently does not employ photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5). It is, therefore, exempt from all emission limitations and control requirements contained in OAC rule 3745-21-07(G).

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II. **Operational Restrictions**

- 1. None

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

- 1. The permittee shall collect and record the following information each month for the coating operation:
 - a. The company identification for each coating and cleanup material employed.
 - b. The OC content of each coating and cleanup material employed, in pounds per gallon.
 - c. The number of gallons of each coating and cleanup employed.
 - d. The total OC emissions for all the coatings and cleanup materials employed, in tons {[summation of b x c] for all cleanup materials + [summation of b x c] for all coatings, divided by 2000 lbs/ton}.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04821]

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IV. Reporting Requirements

1. Prior to employing any photochemically reactive material in this emissions unit, the permittee shall provide written notification to the Director (the appropriate Ohio EPA District Office or local air agency). Such notification shall include information sufficient to determine compliance with the emission limits and/or control requirements specified in OAC rule 3745-21-07(G).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04821]

2. The permittee shall submit annual reports that specify the total actual annual OC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04821]

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V. Testing Requirements

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

a. Emission Limitation-

The OC emissions from this emissions unit shall not exceed 7.31 lbs/hr, excluding cleanup.

Applicable Compliance Method-

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

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04821]

b. Emission Limitation-

The OC emissions from this emissions unit shall not exceed 1.95 tons/yr, including cleanup.

Applicable Compliance Method-

Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements specified in Section A.III.1.d. of this permit, and shall be the sum of the 12 monthly OC emission rates for the calendar year.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04821]

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04821]

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0829710349 Emissions Unit ID: P005 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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- Plastic Extrusion Coating Line No. 5	OAC rule 3745-114-01 and ORC 3704.03(F)	See Sections B.III.1-4 and B.IV.1.

2. Additional Terms and Conditions

1. None

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permit to install for these emissions unit(s) [P003-P008, P014, P016, P020-P022] were evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee in the permit application. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration results from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compounds emitted from the emissions units, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: Toluene

TLV (mg/m3): 188.8 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 14.74 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 910 ug/m3

MAGLC (ug/m3): 4,495 ug/m3

Toxic Contaminant: Ethylene Glycol

TLV (mg/m3): 100 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 21.31 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,316 ug/m3

MAGLC (ug/m3): 1,755 ug/m3

The permittee, has demonstrated that emissions of [Ethylene Glycol and Toluene], from emissions unit(s) [P003-P008, P014, P016, P020-P022], is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be

applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]

2. Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]

3. The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

- b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);

- c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

- d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]

4. The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]

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IV. Reporting Requirements

1. The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]

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V. Testing Requirements

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0829710349 Emissions Unit ID: P006 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P006- Plastic Extrusion Coating Line No. 6	OAC rule 3745-31-05(A)(3) PTI 08-04821	The organic compound (OC) emissions from this emissions unit shall not exceed 7.31 lbs/hr (excluding cleanup emissions) and 1.95 tons/yr, including cleanup emissions.
	OAC rule 3745-21-07(G)(9)	None, see section A.I.2.b.

2. Additional Terms and Conditions

- a. The 7.31 lbs OC/hr emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.
- b. This emissions unit currently does not employ photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5). It is, therefore, exempt from all emission limitations and control requirements contained in OAC rule 3745-21-07(G).

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II. **Operational Restrictions**

1. None

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

1. The permittee shall collect and record the following information each month for the coating operation:
 - a. The company identification for each coating and cleanup material employed.
 - b. The OC content of each coating and cleanup material employed, in pounds per gallon.
 - c. The number of gallons of each coating and cleanup employed.
 - d. The total OC emissions for all the coatings and cleanup materials employed, in tons {[summation of b x c] for all cleanup materials + [summation of b x c] for all coatings, divided by 2000 lbs/ton}.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04821]

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IV. **Reporting Requirements**

1. Prior to employing any photochemically reactive material in this emissions unit, the permittee shall provide written notification to the Director (the appropriate Ohio EPA District Office or local air agency). Such notification shall include information sufficient to determine compliance with the emission limits and/or control requirements specified in OAC rule 3745-21-07(G).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04821]

2. The permittee shall submit annual reports that specify the total actual annual OC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04821]

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V. Testing Requirements

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

- a. Emission Limitation-

The OC emissions from this emissions unit shall not exceed 7.31 lbs/hr, excluding cleanup.

Applicable Compliance Method-

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

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04821]

- b. Emission Limitation-

The OC emissions from this emissions unit shall not exceed 1.95 tons/yr, including cleanup.

Applicable Compliance Method-

Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements specified in Section A.III.1.d. of this permit, and shall be the sum of the 12 monthly OC emission rates for the calendar year.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04821]

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04821]

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0829710349 Emissions Unit ID: P006 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or

control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P006- Plastic Extrusion Coating Line No. 6	OAC rule 3745-114-01 and ORC 3704.03(F)	See Sections B.III.1-4 and B.IV.1.

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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

1. The permit to install for these emissions unit(s) [P003-P008, P014, P016, P020-P022] were evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee in the permit application. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminants emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration results from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compounds emitted from the emissions units, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: Toluene

TLV (mg/m3): 188.8 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 14.74 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 910 ug/m3

MAGLC (ug/m3): 4,495 ug/m3

Toxic Contaminant: Ethylene Glycol

TLV (mg/m3): 100 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 21.31 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,316 ug/m3

MAGLC (ug/m3): 1,755 ug/m3

The permittee, has demonstrated that emissions of [Ethylene Glycol and Toluene], from emissions unit(s) [P003-P008, P014, P016, P020-P022], is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]

2. Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
 - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]

3. The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]

4. The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]

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IV. Reporting Requirements

1. The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]

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V. Testing Requirements

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0829710349 Emissions Unit ID: P007 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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- Plastic Extrusion Coating Line No. 7	OAC rule 3745-31-05(A)(3) PTI 08-04821	The organic compound (OC) emissions from this emissions unit shall not exceed 7.31 lbs/hr (excluding cleanup emissions) and 1.95 tons/yr, including cleanup emissions.
	OAC rule 3745-21-07(G)(9)	None, see section A.I.2.b.

2. Additional Terms and Conditions

- a. The 7.31 lbs OC/hr emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.
- b. This emissions unit currently does not employ photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5). It is, therefore, exempt from all emission limitations and control requirements contained in OAC rule 3745-21-07(G).

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the coating operation:
 - a. The company identification for each coating and cleanup material employed.
 - b. The OC content of each coating and cleanup material employed, in pounds per gallon.
 - c. The number of gallons of each coating and cleanup employed.
 - d. The total OC emissions for all the coatings and cleanup materials employed, in tons {[summation of b x c] for all cleanup materials + [summation of b x c] for all coatings, divided by 2000 lbs/ton}.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04821]

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IV. Reporting Requirements

1. Prior to employing any photochemically reactive material in this emissions unit, the permittee shall provide written notification to the Director (the appropriate Ohio EPA District Office or local air agency). Such

notification shall include information sufficient to determine compliance with the emission limits and/or control requirements specified in OAC rule 3745-21-07(G).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04821]

2. The permittee shall submit annual reports that specify the total actual annual OC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04821]

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V. **Testing Requirements**

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

a. Emission Limitation-

The OC emissions from this emissions unit shall not exceed 7.31 lbs/hr, excluding cleanup.

Applicable Compliance Method-

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

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04821]

b. Emission Limitation-

The OC emissions from this emissions unit shall not exceed 1.95 tons/yr, including cleanup.

Applicable Compliance Method-

Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements specified in Section A.III.1.d. of this permit, and shall be the sum of the 12 monthly OC emission rates for the calendar year.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04821]

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04821]

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0829710349 Emissions Unit ID: P007 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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- Plastic Extrusion Coating Line No. 7	OAC rule 3745-114-01 and ORC 3704.03(F)	See Sections B.III.1-4 and B.IV.1.

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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

1. The permit to install for these emissions unit(s) [P003-P008, P014, P016, P020-P022] were evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee in the permit application. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminants emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration results from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compounds emitted from the emissions units, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: Toluene

TLV (mg/m3): 188.8 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 14.74 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 910 ug/m3

MAGLC (ug/m3): 4,495 ug/m3

Toxic Contaminant: Ethylene Glycol

TLV (mg/m3): 100 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 21.31 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,316 ug/m3

MAGLC (ug/m3): 1,755 ug/m3

The permittee, has demonstrated that emissions of [Ethylene Glycol and Toluene], from emissions unit(s) [P003-P008, P014, P016, P020-P022], is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]

2. Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
 - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]

3. The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]

4. The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]

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IV. Reporting Requirements

1. The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]

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V. Testing Requirements

1. None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0829710349 Emissions Unit ID: P008 Issuance type: Title V Final Permit

A. **State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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- Plastic Extrusion Coating Line No. 8	OAC rule 3745-31-05(A)(3) PTI 08-04821	The organic compound (OC) emissions from this emissions unit shall not exceed 7.31 lbs/hr (excluding cleanup emissions) and 1.95 tons/yr, including cleanup emissions.
	OAC rule 3745-21-07(G)(9)	None, see section A.I.2.b.

2. **Additional Terms and Conditions**

- a. The 7.31 lbs OC/hr emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.
- b. This emissions unit currently does not employ photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5). It is, therefore, exempt from all emission limitations and control requirements contained in OAC rule 3745-21-07(G).

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II. **Operational Restrictions**

1. None

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

1. The permittee shall collect and record the following information each month for the coating operation:
 - a. The company identification for each coating and cleanup material employed.
 - b. The OC content of each coating and cleanup material employed, in pounds per gallon.
 - c. The number of gallons of each coating and cleanup employed.
 - d. The total OC emissions for all the coatings and cleanup materials employed, in tons {[summation of b x c] for all cleanup materials + [summation of b x c] for all coatings, divided by 2000 lbs/ton}.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04821]

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IV. **Reporting Requirements**

1. Prior to employing any photochemically reactive material in this emissions unit, the permittee shall provide written notification to the Director (the appropriate Ohio EPA District Office or local air agency). Such notification shall include information sufficient to determine compliance with the emission limits and/or

control requirements specified in OAC rule 3745-21-07(G).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04821]

2. The permittee shall submit annual reports that specify the total actual annual OC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04821]

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V. **Testing Requirements**

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

a. **Emission Limitation-**

The OC emissions from this emissions unit shall not exceed 7.31 lbs/hr, excluding cleanup.

Applicable Compliance Method-

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

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04821]

b. **Emission Limitation-**

The OC emissions from this emissions unit shall not exceed 1.95 tons/yr, including cleanup.

Applicable Compliance Method-

Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements specified in Section A.III.1.d. of this permit, and shall be the sum of the 12 monthly OC emission rates for the calendar year.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04821]

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04821]

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0829710349 Issuance type: Title V Final Permit

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Facility ID: 0829710349 Emissions Unit ID: P008 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Applicable Emissions Limitations/Control

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Measures</u>
P008- Plastic Extrusion Coating Line No. 8	OAC rule 3745-114-01 and ORC 3704.03(F)	See Sections B.III.1-4 and B.IV.1.

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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

1. The permit to install for these emissions unit(s) [P003-P008, P014, P016, P020-P022] were evaluated based on the actual materials and the design parameters of the emissions unit's(s) exhaust system, as specified by the permittee in the permit application. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminants emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration results from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compounds emitted from the emissions units, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: Toluene

TLV (mg/m3): 188.8 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 14.74 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 910 ug/m3

MAGLC (ug/m3): 4,495 ug/m3

Toxic Contaminant: Ethylene Glycol

TLV (mg/m3): 100 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 21.31 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,316 ug/m3

MAGLC (ug/m3): 1,755 ug/m3

The permittee, has demonstrated that emissions of [Ethylene Glycol and Toluene], from emissions unit(s) [P003-P008, P014, P016, P020-P022], is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PT1 08-04821]

2. Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.
[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]
3. The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
- a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]
4. The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]

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IV. Reporting Requirements

- The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.
[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]

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V. Testing Requirements

- None

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VI. Miscellaneous Requirements

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0829710349 Emissions Unit ID: P014 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
P014 - Plastic Extrusion Coating Line No. 13	OAC rule 3745-31-05(A)(3) PTI 08-04821	The organic compound (OC) emissions from this emissions unit shall not exceed 7.31 lbs/hr (excluding cleanup emissions) and 1.95 tons/yr, including cleanup emissions.
	OAC rule 3745-21-07(G)(9)	None, see section A.I.2.b.

2. Additional Terms and Conditions

- a. The 7.31 lbs OC/hr emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.
- b. This emissions unit currently does not employ photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5). It is, therefore, exempt from all emission limitations and control requirements contained in OAC rule 3745-21-07(G).

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the coating operation:
 - a. The company identification for each coating and cleanup material employed.
 - b. The OC content of each coating and cleanup material employed, in pounds per gallon.
 - c. The number of gallons of each coating and cleanup employed.
 - d. The total OC emissions for all the coatings and cleanup materials employed, in tons {[summation of b x c] for all cleanup materials + [summation of b x c] for all coatings, divided by 2000 lbs/ton}.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04821]

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IV. Reporting Requirements

1. Prior to employing any photochemically reactive material in this emissions unit, the permittee shall provide written notification to the Director (the appropriate Ohio EPA District Office or local air agency). Such notification shall include information sufficient to determine compliance with the emission limits and/or control requirements specified in OAC rule 3745-21-07(G).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04821]

2. The permittee shall submit annual reports that specify the total actual annual OC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04821]

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V. **Testing Requirements**

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

- a. Emission Limitation-
The OC emissions from this emissions unit shall not exceed 7.31 lbs/hr, excluding cleanup.

Applicable Compliance Method-
Compliance with the hourly allowable OC emission limitation may be determined by multiplying the maximum OC content of all the coatings (lbs/gallon) by the maximum coatings usage rate (gallons/hr).

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04821]

- b. Emission Limitation-
The OC emissions from this emissions unit shall not exceed 1.95 tons/yr, including cleanup.

Applicable Compliance Method-
Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements specified in Section A.III.1.d. of this permit, and shall be the sum of the 12 monthly OC emission rates for the calendar year.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04821]

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04821]

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0829710349 Emissions Unit ID: P014 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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P014- Plastic Extrusion Coating Line No. 13 OAC rule 3745-114-01 and ORC 3704.03(F) See Sections B.III.1-4 and B.IV.1.

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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

1. The permit to install for these emissions unit(s) [P003-P008, P014, P016, P020-P022] were evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee in the permit application. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminants emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration results from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compounds emitted from the emissions units, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: Toluene

TLV (mg/m3): 188.8 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 14.74 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 910 ug/m3

MAGLC (ug/m3): 4,495 ug/m3

Toxic Contaminant: Ethylene Glycol

TLV (mg/m3): 100 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 21.31 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,316 ug/m3

MAGLC (ug/m3): 1,755 ug/m3

The permittee, has demonstrated that emissions of [Ethylene Glycol and Toluene], from emissions unit(s) [P003-P008, P014, P016, P020-P022], is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]

2. Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that

could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]

3. The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]

4. The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]

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IV. Reporting Requirements

1. The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0829710349 Emissions Unit ID: P016 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
P016- Plastic Extrusion Coating Line No.14	OAC rule 3745-31-05(A)(3) PTI 08-04821	The organic compound (OC) emissions from this emissions unit shall not exceed 7.31 lbs/hr (excluding cleanup emissions) and 1.95 tons/yr, including cleanup emissions.
	OAC rule 3745-21-07(G)(9)	None, see section A.I.2.b.

2. Additional Terms and Conditions

- a. The 7.31 lbs OC/hr emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.
- b. This emissions unit currently does not employ photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5). It is, therefore, exempt from all emission limitations and control requirements contained in OAC rule 3745-21-07(G).

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information each month for the coating operation:
 - a. The company identification for each coating and cleanup material employed.
 - b. The OC content of each coating and cleanup material employed, in pounds per gallon.
 - c. The number of gallons of each coating and cleanup employed.
 - d. The total OC emissions for all the coatings and cleanup materials employed, in tons {[summation of b x c for all cleanup materials + [summation of b x c) for all coatings, divided by 2000 lbs/ton].

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04821]

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IV. Reporting Requirements

- 1. Prior to employing any photochemically reactive material in this emissions unit, the permittee shall provide written notification to the Director (the appropriate Ohio EPA District Office or local air agency). Such notification shall include information sufficient to determine compliance with the emission limits and/or control requirements specified in OAC rule 3745-21-07(G).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04821]

2. The permittee shall submit annual reports that specify the total actual annual OC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04821]

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V. Testing Requirements

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

- a. Emission Limitation-
The OC emissions from this emissions unit shall not exceed 7.31 lbs/hr, excluding cleanup.

Applicable Compliance Method-
Compliance with the hourly allowable OC emission limitation may be determined by multiplying the maximum OC content of all the coatings (lbs/gallon) by the maximum coatings usage rate (gallons/hr).

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04821]

- b. Emission Limitation-
The OC emissions from this emissions unit shall not exceed 1.95 tons/yr, including cleanup.

Applicable Compliance Method-
Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements specified in Section A.III.1.d. of this permit, and shall be the sum of the 12 monthly OC emission rates for the calendar year.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04821]

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04821]

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0829710349 Emissions Unit ID: P016 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
P016- Plastic Extrusion Coating Line No.14	OAC rule 3745-114-01 and ORC 3704.03(F)	See Sections B.III.1-4 and B.IV.1.

2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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

1. The permit to install for these emissions unit(s) [P003-P008, P014, P016, P020-P022] were evaluated based on the actual materials and the design parameters of the emissions unit's(s) exhaust system, as specified by the permittee in the permit application. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminants emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration results from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
- the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compounds emitted from the emissions units, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
 - The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
 - This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$
 - The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: Toluene

TLV (mg/m3): 188.8 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 14.74 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 910 ug/m3

MAGLC (ug/m3): 4,495 ug/m3

Toxic Contaminant: Ethylene Glycol

TLV (mg/m3): 100 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 21.31 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,316 ug/m3

MAGLC (ug/m3): 1,755 ug/m3

The permittee, has demonstrated that emissions of [Ethylene Glycol and Toluene], from emissions unit(s) [P003-P008, P014, P016, P020-P022], is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]
2. Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum

ground-level concentration include, but are not limited to, the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]

3. The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]

4. The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]

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IV. Reporting Requirements

1. The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0829710349 Emissions Unit ID: P020 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
P020- Plastic Extrusion Coating Line No. 10	OAC rule 3745-31-05(A)(3)(b) (voluntary restriction to avoid BAT)	See A.2.a.
	OAC rule 3745-21-07(G)(9)	None, see section A.I.2.b.

2. Additional Terms and Conditions

- a. Permit to Install 08-04821 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3475-31-05(A)(3):
 - (a)
 - i. To limit the potential organic compound (OC) emissions less than 10.0 tons per year.
 - b. This emissions unit currently does not employ photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5). It is, therefore, exempt from all emission limitations and control requirements contained in OAC rule 3745-21-07(G).

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. None

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IV. Reporting Requirements

1. Prior to employing any photochemically reactive material in this emissions unit, the permittee shall provide written notification to the Director(the appropriate Ohio EPA District Office or local air agency). Such notification shall include information sufficient to determine compliance with the emission limits and/or control requirements specified in OAC rule 3745-21-07(G).
2. The permittee shall submit annual reports that specify the total actual annual OC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

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V. Testing Requirements

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

- a. Emission Limitation-
The OC emissions shall be less than 10.0 tons/yr.

Applicable Compliance Method-
The permittee may demonstrate compliance with the annual allowable OC emission limitation by multiplying the maximum OC content of all the coatings and cleanup materials (lbs/gallon) by the actual annual coatings and cleanup material usage rate (gallons/yr) and then dividing by 2000 lbs/ton.
- 2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0829710349 Emissions Unit ID: P020 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
P020- Plastic Extrusion Coating Line No.10	OAC rule 3745-114-01 and ORC 3704.03(F)	See Sections B.III.1-4 and B.IV.1.

2. **Additional Terms and Conditions**

- 1. None

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II. **Operational Restrictions**

- 1. None

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

- 1. The permit to install for these emissions unit(s) [P003-P008, P014, P016, P020-P022] were evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee in the permit application. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminants emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration results from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
 - a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compounds emitted from the emissions units, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 \text{ TLV}/XY = \text{MAGLC}$$

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: Toluene

TLV (mg/m3): 188.8 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 14.74 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 910 ug/m3

MAGLC (ug/m3): 4,495 ug/m3

Toxic Contaminant: Ethylene Glycol

TLV (mg/m3): 100 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 21.31 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,316 ug/m3

MAGLC (ug/m3): 1,755 ug/m3

The permittee, has demonstrated that emissions of [Ethylene Glycol and Toluene], from emissions unit(s) [P003-P008, P014, P016, P020-P022], is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]

2. Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]

3. The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

- b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or

worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);

- c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
- d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]
- 4. The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]

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IV. Reporting Requirements

- 1. The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]

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V. Testing Requirements

- 1. None

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VI. Miscellaneous Requirements

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0829710349 Emissions Unit ID: P021 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
P021- Plastic Extrusion Coating Line No. 11	OAC rule 3745-31-05(A)(3)(b) (voluntary restriction to avoid BAT) OAC rule 3745-21-07(G)(9)	See A.2.a. None, see section A.I.2.b.

- 2. **Additional Terms and Conditions**

- a. Permit to Install 08-04821 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3475-31-05(A)(3):
 - (a)
 - i. To limit the potential organic compound (OC) emissions less than 10.0 tons per year.
 - b. This emissions unit currently does not employ photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5). It is, therefore, exempt from all emission limitations and control requirements contained in OAC rule 3745-21-07(G).

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. None

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IV. Reporting Requirements

- 1. Prior to employing any photochemically reactive material in this emissions unit, the permittee shall provide written notification to the Director(the appropriate Ohio EPA District Office or local air agency). Such notification shall include information sufficient to determine compliance with the emission limits and/or control requirements specified in OAC rule 3745-21-07(G).
- 2. The permittee shall submit annual reports that specify the total actual annual OC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

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V. Testing Requirements

- 1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation-
The OC emissions shall be less than 10.0 tons/yr.

Applicable Compliance Method-
The permittee may demonstrate compliance with the annual allowable OC emission limitation by multiplying the maximum OC content of all the coatings and cleanup materials (lbs/gallon) by the actual annual coatings and cleanup material usage rate (gallons/yr) and then dividing by 2000 lbs/ton.
- 2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 0829710349 Emissions Unit ID: P021 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under

state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
P021- Plastic Extrusion Coating Line No. 11	OAC rule 3745-114-01 and ORC 3704.03(F)	See Sections B.III.1-4 and B.IV.1.

2. Additional Terms and Conditions

1. None

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permit to install for these emissions unit(s) [P003-P008, P014, P016, P020-P022] were evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee in the permit application. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminants emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration results from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compounds emitted from the emissions units, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 \text{ TLV}/XY = \text{MAGLC}$$

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: Toluene

TLV (mg/m3): 188.8 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 14.74 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 910 ug/m3

MAGLC (ug/m3): 4,495 ug/m3

Toxic Contaminant: Ethylene Glycol

TLV (mg/m3): 100 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 21.31 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,316 ug/m3

MAGLC (ug/m3): 1,755 ug/m3

The permittee, has demonstrated that emissions of [Ethylene Glycol and Toluene], from emissions unit(s) [P003-P008, P014, P016, P020-P022], is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]

2. Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]

3. The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

- b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03 (F);

- c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

- d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]

4. The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]

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IV. Reporting Requirements

1. The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0829710349 Emissions Unit ID: P022 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
P022- Plastic Extrusion Coating Line No. 12	OAC rule 3745-31-05(A)(3)(b) (voluntary restriction to avoid BAT) OAC rule 3745-21-07(G)(9)	See A.2.a. None, see section A.I.2.b.

2. **Additional Terms and Conditions**

- a. Permit to Install 08-04821 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3475-31-05(A)(3):
 - (a)
 - i. To limit the potential organic compound (OC) emissions less than 10.0 tons per year.
 - b. This emissions unit currently does not employ photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5). It is, therefore, exempt from all emission limitations and control requirements contained in OAC rule 3745-21-07(G).

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II. **Operational Restrictions**

- 1. None

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

- 1. None

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IV. Reporting Requirements

1. Prior to employing any photochemically reactive material in this emissions unit, the permittee shall provide written notification to the Director(the appropriate Ohio EPA District Office or local air agency). Such notification shall include information sufficient to determine compliance with the emission limits and/or control requirements specified in OAC rule 3745-21-07(G).
2. The permittee shall submit annual reports that specify the total actual annual OC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

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V. Testing Requirements

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation-
The OC emissions shall be less than 10.0 tons/yr.

Applicable Compliance Method-
The permittee may demonstrate compliance with the annual allowable OC emission limitation by multiplying the maximum OC content of all the coatings and cleanup materials (lbs/gallon) by the actual annual coatings and cleanup material usage rate (gallons/yr) and then dividing by 2000 lbs/ton.
2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0829710349 Emissions Unit ID: P022 Issuance type: Title V Final Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
P022- Plastic Extrusion Coating Line No. 12	OAC rule 3745-114-01 and ORC 3704.03(F)	See Sections B.III.1-4 and B.IV.1.

2. Additional Terms and Conditions

1. None

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permit to install for these emissions unit(s) [P003-P008, P014, P016, P020-P022] were evaluated based on the actual materials and the design parameters of the emissions unit's(s) exhaust system, as specified by the permittee in the permit application. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminants emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration results from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compounds emitted from the emissions units, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

- i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

- ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 \text{ TLV}/XY = \text{MAGLC}$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: Toluene

TLV (mg/m3): 188.8 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 14.74 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 910 ug/m3

MAGLC (ug/m3): 4,495 ug/m3

Toxic Contaminant: Ethylene Glycol

TLV (mg/m3): 100 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 21.31 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,316 ug/m3

MAGLC (ug/m3): 1,755 ug/m3

The permittee, has demonstrated that emissions of [Ethylene Glycol and Toluene], from emissions unit(s) [P003-P008, P014, P016, P020-P022], is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PT1 08-04821]

2. Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes,

the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]

3. The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03 (F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]

4. The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]

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IV. Reporting Requirements

1. The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

[ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01 and PTI 08-04821]

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None