



State of Ohio Environmental Protection Agency

RE: **DRAFT PERMIT TO INSTALL CERTIFIED MAIL**  
**CLERMONT COUNTY**

Street Address:

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

Mailing Address:  
Lazarus Gov.  
Center

**Application No:** 14-05338

**DATE:** 9/5/2002

Cincinnati Fiberglass  
John Glass  
4174 Half Acre Road  
Batavia, OH 45103

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$800** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

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

CC: USEPA      HCDES      Ohio-KY-IN Reg Council of Gov      KY      IN



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install  
Terms and Conditions**

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

**DRAFT PERMIT TO INSTALL 14-05338**

Application Number: 14-05338  
APS Premise Number: 1413020248  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Cincinnati Fiberglass  
Person to Contact: John Glass  
Address: 4174 Half Acre Road  
Batavia, OH 45103

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

**4174 Half Acre Road  
Batavia Ohio, Ohio**

Description of proposed emissions unit(s):

**Two gel coaters and RTM units.**

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

**A. State and Federally Enforceable Permit To Install General Terms and Conditions**

**1. Monitoring and Related Recordkeeping and Reporting Requirements**

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - i. The date, place (as defined in the permit), and time of sampling or measurements.
  - ii. The date(s) analyses were performed.
  - iii. The company or entity that performed the analyses.
  - iv. The analytical techniques or methods used.
  - v. The results of such analyses.
  - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
  - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.10 below if no deviations occurred during the quarter.

Cincinnati Fiberglass  
PTI Application: 14-05338

Facility ID: 1413020248

Issued: To be entered upon final issuance

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

## 2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

## 3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

## 4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

## 5. Severability Clause

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A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

**6. General Requirements**

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

**7. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

**8. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit

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

shall not be federally enforceable and shall be enforceable under State law only.

**9. Compliance Requirements**

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
  - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

Cincinnati Fiberglass

PTI Application: 14-05338

Issued: To be entered upon final issuance

Facility ID: 1413020248

#### **10. Permit To Operate Application**

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

#### **11. Best Available Technology**

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

#### **12. Air Pollution Nuisance**

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

Cincinnati Fiberglass  
PTI Application: 14-05338

Facility ID: 1413020248

Issued: To be entered upon final issuance

**B. State Only Enforceable Permit To Install General Terms and Conditions**

**1. Compliance Requirements**

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

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

The permittee shall submit required reports in the following manner:

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

**3. Permit Transfers**

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

**4. Termination of Permit To Install**

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may

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be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**5. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

**6. Public Disclosure**

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

**7. Applicability**

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

**8. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the

Cincinnati Fiberglass  
PTI Application: 14-05338

Facility ID: 1413020248

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

facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)**

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

**C. Permit To Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)  
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	28
PM/PM10	0.48
Acetone	11.88

**Cincinnati Fiberglass**

**PTI Application: 14-05338**

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

**Facility ID: 1413020248**

**Cincinnati Fiberglass**  
**PTI Application: 14-05228**  
**Issued**

**Facility ID: 1413020248**

Emissions Unit ID: P026

**Part II - FACILITY SPECIFIC TERMS AND CONDITIONS**

**A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions**

None

**B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions**

None

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	OAC rule 3745-21-07(G)
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P026 - Service Gel Coat 3 Building B	OAC rule 3745-31-05(A)(3)	
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OAC rule 3745-31-28

OAC rule 3745-17-07(A)(1)

OAC rule 3745-17-11

Cincinnati

PTI A

Emissions Unit ID: P026

Issued: To be entered upon final issuance

Applicable Emissions  
Limitations/Control  
Measures

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

See Term A.I.2.c., A.II.3.

8.0 lbs/hr OC from coatings  
40 lbs/day OC from coatings  
19.8 lbs/day Acetone (OC)  
from cleanup materials  
2.97 TPY Acetone (OC)  
from cleanup materials  
0.28 lb/hr PM/PM10  
1.38 lbs/day PM/PM10  
0.24 TPY PM/PM10\*

\*Based on a rolling 12-month summation.

See term A.I.2.b.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-28.

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

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule

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

**2. Additional Terms and Conditions**

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the cleanup material usage limits, OC emission limitations and compliance with the Air Toxics Policy.
- 2.b** The annual OC emission limit, from coatings, employed in emissions units P026, P029, P040 and P041 combined shall not exceed 28.0 TPY, based on a rolling, 12-month summation.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Emissions of OC (Tons)</u>
1	2.5
1-2	5.0
1-3	7.5
1-4	10.0
1-5	12.5
1-6	15.0
1-7	17.5
1-8	20.0
1-9	22.5
1-10	25.0
1-11	27.5
1-12	28.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for OC emissions shall be based upon a rolling, 12-month summation of the monthly emissions.

- 2.c** The permittee shall comply with the following emission limits in pounds of HAP (Hazardous Air Pollutants) per ton of gel coat for this emissions unit:

<u>Material</u>	<u>Limit</u>
Pigmented Production-White Gel Coat	267
Pigmented Production-Non-White Gel Coat	377
Clear Production Gel Coat	504

16

Cincinnati

PTI A

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

Emissions Unit ID: P026

This limit may be based on a rolling, 12-month average.

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

## **II. Operational Restrictions**

1. The amount of cleanup material used in emissions unit P026 shall not exceed 3 gallons/day and 900 gallons/year.
2. The permittee shall employ nonphotochemically reactive cleanup materials in emissions unit P026.
3. The permittee shall employ non-HAP containing cleanup materials in emissions unit P026.
4. The permittee shall employ cleanup materials in emissions unit P026 which have a maximum OC content of 6.6 pounds of OC per gallon, as applied.
5. The permittee shall operate and maintain a filtering system to control particulate emissions from emissions unit P026.
6. The permittee shall keep containers that store HAP materials closed or covered except during the addition or removal of materials.

## **III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information for each day for emissions unit P026:
  - a. The company identification for each gel coat and cleanup material employed.
  - b. The number of pounds of each gel coat material employed.
  - c. The percent styrene of each gel coat employed in each emissions unit.
  - d. The number of gallons of cleanup material employed.
  - e. The organic compound content of the cleanup material, in pounds per gallon.
  - f. The total organic compound emission rate for all gel coat, in pounds per day.
  - g. The daily emissions from cleanup materials (d x e).
  - h. The total number of hours the emissions unit was in operation.
  - i. The average hourly organic compound emission rate for all gel coats, in pounds per hour

Emissions Unit ID: P026

(f/h).

- j. A record of each liquid organic cleanup material employed in emissions unit P026 indicating whether or not the liquid organic material is photochemically reactive as defined in OAC rule 3745-21-01(C)(5) or contains HAP's.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

2. The permittee shall collect and record the following information for each month for emissions unit P026:
  - a. The total number of gallons of cleanup material employed each month.
  - b. The organic compound content of the cleanup material, in pounds per gallon.
  - c. The monthly Acetone (OC) emissions from cleanup materials (a x b).
  - d. The average pounds of HAP per ton of gel coat for each material listed in term A.I.2.c.
  - e. The updated rolling, 12-month average pounds of HAP per ton of gel coat for each material listed in term A.I.2.c.
3. In order to determine compliance with the group annual OC emission limit, the permittee shall maintain monthly records of the following information for emissions units: P026, P029, P040 and P041
  - a. The company identification for each coating or gel coat employed in each emissions unit.
  - b. The number of pounds of each coating or gel coat material employed in each emissions unit.
  - c. The percent styrene of each coating or gel coat employed in each emissions unit.
  - d. The total organic compound emission rate for all coatings and gel coats, in pounds per month.
  - e. The rolling, 12-month summation of the total coating and gel coat usage figures for all emissions units in the group.
  - f. The rolling, 12-month summation of the OC emissions for all emissions units in the group.

Also during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative OC emissions for each calendar month for all emissions units in the group.

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

4. The permittee shall maintain a certified statement that the permittee is in compliance with the work practice standard in T&C A.II.6.

**IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the daily and/or hourly emissions limitations in T&C A.I.1.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the usage limitations in T&C A.II.1.
3. The permittee shall submit deviation (excursion) reports which identify an exceedance of the OC content limitation in T&C A.II.4.
4. The permittee shall submit a deviation (excursion) report which identifies an exceedance of the annual Acetone (OC) emissions limit from cleanup materials.
5. The permittee shall submit quarterly reports which specify the total organic compound emissions from emissions units P026, P029, P040 and P041 combined for each calendar month based on a rolling, 12-month summation. For the first 12 calendar months of operation after issuance of this permit, the permittee shall include the combined cumulative OC emissions for each calendar month. These reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and cover the previous three calendar months.
6. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive cleanup material [as defined in OAC rule 3745-21-01(C)(5)] and/or any HAP containing cleanup material was employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
7. The permittee shall submit deviation (excursion) reports which identify an exceedance of the HAP limitations in T&C A.I.2.c.
8. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

**V. Testing Requirements**

1. Compliance with the visible particulate emissions limitation shall be demonstrated by Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for

Emissions Unit ID: P026

New Stationary Sources,").

2. Compliance with the OC and HAP emission limitations for emissions unit P026 shall be demonstrated by multiplying the amount of gel coat used by the appropriate emission factor found in the Unified Emission Factor (UEF) Table from "The Technical Discussion of the Unified Emission Factors for Open Molding of Composites" (dated July 23, 2001 or the most recent update) as follows:
  - a.  $\text{\#/hr OC emissions} = \text{\#/day OC emissions} \div \text{hours of operation}$
  - b.  $\text{\#/day OC emissions} = \text{\# gel coat/day} \times \text{emission factor} \times \text{Ton/2000\#}$
  - c.  $\text{Ton/yr OC emissions} = \text{Ton gel coat/yr} \times \text{emission factor} \times \text{Ton/2000\#}$

\* Based on a rolling, 12-month summation.
3. Compliance with the usage restrictions in T&C A.II.1 shall be demonstrated by the recordkeeping in T&C A.III.1 and A.III.2.
4. Compliance with the Acetone (OC) emissions limitations, from cleanup materials, for emissions unit P026 shall be demonstrated by the recordkeeping in T&C A.III. 1 and 2.
5. Compliance with the OC emissions limit in T&C A.I.2.b. shall be demonstrated by the recordkeeping in T&C A.III.3 and the equation in term A.V.2.c.
6. Compliance with the HAP emissions limit in T&C A.I.2.c shall be demonstrated by the recordkeeping in T&C A.III.2 (see term V.2.).
7. Compliance with the particulate emission rate shall be demonstrated by the following:
  - a.  $\text{Lbs/hr.} = \text{\# gel coat/hr} \times (1 - \text{volatile content, percent by weight}) \times (1 - .75 \text{ overspray control}) \times (1 - .985 \text{ Control efficiency})$ .
  - b.  $\text{Lbs/day} = \text{\# gel coat/day} \times (1 - \text{volatile content, percent by weight}) \times (1 - .75 \text{ overspray control}) \times (1 - .985 \text{ Control efficiency})$ .
  - c.  $\text{TPY} = \text{\# gel coat/year} \times (1 - \text{volatile content, percent by weight}) \times (1 - .75 \text{ overspray control}) \times (1 - .985 \text{ Control efficiency}) \times \text{ton/2000 lbs.}$
8. Compliance with T&C A.II.2 and A.II.3 shall be demonstrated by the recordkeeping in T&C A.III.1.
9. The gel coat HAP contents may be based on Material Safety Data Sheets or resin specification sheets.

21

Cincinnati

PTI A

Emissions Unit ID: P026

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**VI. Miscellaneous Requirements**

1. The MACT determination was based on a PowerPoint presentation from Keith Barnett of USEPA dated February 1, 2002.

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**B. State Only Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P026 - Service Gel Coat 3 Building B		See Term B. III. 1.

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

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

1. The permit to install for this emissions unit P026 was evaluated based on the actual materials(typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model(or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s) from emissions units P026, P029, P040 and P041:

Pollutant: Styrene

TLV (ug/m3): 85,000

Emissions Unit ID: P026

Total Maximum Hourly Emission Rate for all styrene emitting emissions units (lbs/hr): 26

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 820.8

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 2029

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.
- The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"
- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

24

Cincinnati

PTI A

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Emissions Unit ID: P026

**IV. Reporting Requirements**

None

25

Cincinnati

PTI A

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

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

Emissions Unit ID: P026

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	OAC rule 3745-21-07(G)
P029 - Service Gel Coat 4 Building B	OAC rule 3745-31-05(A)(3)	OAC rule 3745-31-28
	OAC rule 3745-17-07(A)(1)	
	OAC rule 3745-17-11	

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PTI A

Emissions Unit ID: P029

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Applicable Emissions  
Limitations/Control  
Measures

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

See Term A.I.2.c., A.II.3.

8.0 lbs/hr OC from coatings  
40 lbs/day OC from coatings  
19.8 lbs/day Acetone (OC)  
from cleanup materials  
2.97 TPY Acetone (OC)  
from cleanup materials  
0.28 lb/hr PM/PM10  
1.38 lbs/day PM/PM10  
0.24 TPY PM/PM10\*

\*Based on a rolling 12-month summation

See term A.I.2.b.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-28.

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

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule

Emissions Unit ID: P029

## 2. Additional Terms and Conditions

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the cleanup material usage limits, OC emission limitations and compliance with the Air Toxics Policy.
- 2.b** The annual OC emission limit, from coatings, employed in emissions units P026, P029, P040 and P041 combined shall not exceed 28.0 TPY, based on a rolling, 12-month summation.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Emissions of OC (Tons)</u>
1	2.5
1-2	5.0
1-3	7.5
1-4	10.0
1-5	12.5
1-6	15.0
1-7	17.5
1-8	20.0
1-9	22.5
1-10	25.0
1-11	27.5
1-12	28.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for OC emissions shall be based upon a rolling, 12-month summation of the monthly emissions.

- 2.c** The permittee shall comply with the following emission limits in pounds of HAP (Hazardous Air Pollutants) per ton of gel coat for this emissions unit:

<u>Material</u>	<u>Limit</u>
Pigmented Production-White Gel Coat	267
Pigmented Production-Non-White Gel Coat	377
Clear Production Gel Coat	504

This limit may be based on a rolling, 12-month average.

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## **II. Operational Restrictions**

1. The amount of cleanup material used in emissions unit P029 shall not exceed 3 gallons/day and 900 gallons/year.
2. The permittee shall employ nonphotochemically reactive cleanup materials in emissions unit P029.
3. The permittee shall employ non-HAP containing cleanup materials in emissions unit P029.
4. The permittee shall employ cleanup materials in emissions unit P029 which have a maximum OC content of 6.6 pounds of OC per gallon, as applied.
5. The permittee shall operate and maintain a filtering system to control particulate emissions from emissions unit P029.
6. The permittee shall keep containers that store HAP materials closed or covered except during the addition or removal of materials.

## **III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information for each day for emissions unit P029:
  - a. The company identification for each gel coat and cleanup material employed.
  - b. The number of pounds of each gel coat material employed.
  - c. The percent styrene of each gel coat employed in each emissions unit.
  - d. The number of gallons of cleanup material employed.
  - e. The organic compound content of the cleanup material, in pounds per gallon.
  - f. The total organic compound emission rate for all gel coats, in pounds per day.
  - g. The daily emissions from cleanup materials (d x e).
  - h. The total number of hours the emissions unit was in operation.
  - i. The average hourly organic compound emission rate for all gel coats, in pounds per hour

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(f/h).

- j. A record of each liquid organic cleanup material employed in emissions unit P029 indicating whether or not the liquid organic material is photochemically reactive as defined in OAC rule 3745-21-01(C)(5) or contains HAP's.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

2. The permittee shall collect and record the following information for each month for emissions unit P029:
  - a. The total number of gallons of cleanup material employed each month.
  - b. The organic compound content of the cleanup material, in pounds per gallon.
  - c. The monthly Acetone (OC) emissions from cleanup materials (a x b).
  - d. The average pounds of HAP per ton of gel coat for each material listed in term A.I.2.c.
  - e. The updated rolling, 12-month average pounds of HAP per ton of gel coat for each material listed in term A.I.2.c.
3. In order to determine compliance with the group annual OC emission limit, the permittee shall maintain monthly records of the following information for emissions units: P026, P029, P040 and P041
  - a. The company identification for each coating or gel coat employed in each emissions unit.
  - b. The number of pounds of each coating or gel coat material employed in each emissions unit.
  - c. The percent styrene of each coating or gel coat employed in each emissions unit.
  - d. The total organic compound emission rate for all coatings and gel coats, in pounds per month.
  - e. The rolling, 12-month summation of the total coating and gel coat usage figures for all emissions units in the group.
  - f. The rolling, 12-month summation of the OC emissions for all emissions units in the group.

Emissions Unit ID: P029

Also during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative OC emissions for each calendar month for all emissions units in the group.

4. The permittee shall maintain a certified statement that the permittee is in compliance with the work practice standard in T&C A.II.6.

#### **IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the daily and/or hourly emissions limitations in T&C A.I.1.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the usage limitations in T&C A.II.1.
3. The permittee shall submit deviation (excursion) reports which identify an exceedance of the OC content limitation in T&C A.II.4.
4. The permittee shall submit a deviation (excursion) report which identifies an exceedance of the annual Acetone (OC) emissions limit from cleanup materials.
5. The permittee shall submit quarterly reports which specify the total organic compound emissions from emissions units P026, P029, P040 and P041 combined for each calendar month based on a rolling, 12-month summation. For the first 12 calendar months of operation after issuance of this permit, the permittee shall include the combined cumulative OC emissions for each calendar month. These reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and cover the previous three calendar months.
6. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive cleanup material [as defined in OAC rule 3745-21-01(C)(5)] and/or any HAP containing cleanup material was employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
7. The permittee shall submit deviation (excursion) reports which identify an exceedance of the HAP limitations in T&C A.I.2.c.
8. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

#### **V. Testing Requirements**

1. Compliance with the visible particulate emissions limitation shall be demonstrated by Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for

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New Stationary Sources,").

2. Compliance with the OC and HAP emission limitations for emissions unit P029 shall be demonstrated by multiplying the amount of gel coat used by the appropriate emission factor found in the Unified Emission Factor (UEF) Table from "The Technical Discussion of the Unified Emission Factors for Open Molding of Composites" (dated July 23, 2001 or the most recent update) as follows:
  - a.  $\text{\#/hr OC emissions} = \text{\#/day OC emissions} \div \text{hours of operation}$
  - b.  $\text{\#/day OC emissions} = \text{\# gel coat/day} \times \text{emission factor} \times \text{Ton/2000\#}$
  - c.  $\text{Ton/yr OC emissions} = \text{Ton gel coat/yr} \times \text{emission factor} \times \text{Ton/2000\#}$

\* Based on a rolling, 12-month summation.
3. Compliance with the usage restrictions in T&C A.II.1 shall be demonstrated by the recordkeeping in T&C A.III.1 and A.III.2.
4. Compliance with the Acetone (OC) emissions limitations, from cleanup materials, for emissions unit P029 shall be demonstrated by the recordkeeping in T&C A.III. 1 and 2.
5. Compliance with the OC emissions limit in T&C A.I.2.b. shall be demonstrated by the recordkeeping in T&C A.III.3 and the equation in term A.V.2.c.
6. Compliance with the HAP emissions limit in T&C A.I.2.c shall be demonstrated by the recordkeeping in T&C A.III.2 (see term V.2.).
7. Compliance with the particulate emission rate shall be demonstrated by the following:
  - a.  $\text{Lbs/hr.} = \text{\# gel coat/hr} \times (1 - \text{volatile content, percent by weight}) \times (1 - .75 \text{ overspray control}) \times (1 - .985 \text{ Control efficiency}).$
  - b.  $\text{Lbs/day} = \text{\# gel coat/day} \times (1 - \text{volatile content, percent by weight}) \times (1 - .75 \text{ overspray control}) \times (1 - .985 \text{ Control efficiency}).$
  - c.  $\text{TPY} = \text{\# gel coat/year} \times (1 - \text{volatile content, percent by weight}) \times (1 - .75 \text{ overspray control}) \times (1 - .985 \text{ Control efficiency}) \times \text{ton/2000 lbs.}$
8. Compliance with T&C A.II.2 and A.II.3 shall be demonstrated by the recordkeeping in T&C

## A.III.1.

9. The gel coat HAP contents may be based on Material Safety Data Sheets or resin specification sheets.

**VI. Miscellaneous Requirements**

1. The MACT determination was based on a PowerPoint presentation from Keith Barnett of USEPA dated February 1, 2002.

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**B. State Only Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P029 - Service Gel Coat 4 Building B		See Term B. III. 1.

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

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

1. The permit to install for this emissions unit P029 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s) from emissions units P026, P029, P040 and P041:

Pollutant: Styrene

TLV (ug/m3): 85,000

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Total Maximum Hourly Emission Rate for all styrene emitting emissions units (lbs/hr): 26

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 820.8

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 2029

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.
- The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"
- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

Emissions Unit ID: P029

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

**IV. Reporting Requirements**

None

37

Cincinnati

PTI A

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Emissions Unit ID: P029

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Issued: To be entered upon final issuance****Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P040 - RTM Pump 5 Building B	OAC rule 3745-31-05(A)(3)	5.0 lbs/hr OC from coatings 40.0 lbs/day OC from coatings 19.8 lbs/day Acetone (OC) from cleanup materials 2.97 TPY Acetone (OC) from cleanup materials
	OAC rule 3745-21-07(G)	See term A.I.2.b.  The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-28	The requirements of this rule are satisfied by the requirements established in accordance with OAC rule 3745-31-05(A)(3).

**2. Additional Terms and Conditions**

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the cleanup material usage limits, OC emission limitations and compliance with the Air Toxics Policy.
- 2.b The annual OC emission limit, from coatings, employed in emissions units P026, P029, P040 and P041 combined shall not exceed 28.0 TPY, based on a rolling, 12-month

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PTI A

Emissions Unit ID: P040

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summation.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Emissions of OC (Tons)</u>
1	2.5
1-2	5.0
1-3	7.5
1-4	10.0
1-5	12.5
1-6	15.0
1-7	17.5
1-8	20.0
1-9	22.5
1-10	25.0
1-11	27.5
1-12	28.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for OC emissions shall be based upon a rolling, 12-month summation of the monthly emissions.

**II. Operational Restrictions**

1. The amount of cleanup material used in emissions unit P040 shall not exceed 3.0 gallons/day and 900 gallons/year.
2. The permittee shall employ nonphotochemically reactive cleanup materials in emissions unit P040.
3. The permittee shall employ cleanup materials in emissions unit P040 which have a maximum OC content of 6.6 pounds of OC per gallon.

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

1. The permittee shall collect and record the following information for each day for emissions unit P040:

Emissions Unit ID: P040

- a. The company identification for each coating (neat resin) and cleanup material employed.
- b. The number of pounds of each coating material employed.
- c. The percent styrene of each coating employed in each emissions unit.
- d. The number of gallons of cleanup material employed.
- e. The organic compound content of the cleanup material, in pounds per gallon.
- f. The total organic compound emission rate for all coatings, in pounds per day.
- g. The daily emissions from cleanup materials (d x e).
- h. The total number of hours the emissions unit was in operation.
- i. The average hourly organic compound emission rate for all coatings, in pounds per hour (f/h).
- j. A record of each liquid organic cleanup material employed in emissions unit P040 indicating whether or not the liquid organic material is photochemically reactive as defined in OAC rule 3745-21-01(C)(5).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

2. The permittee shall collect and record the following information for each month for emissions unit P040:
  - a. The total number of gallons of cleanup material employed each month.
  - b. The organic compound content of the cleanup material, in pounds per gallon.
  - c. The monthly Acetone (OC) emissions from cleanup materials (a x b).
3. In order to determine compliance with the group annual OC emission limit, the permittee shall maintain monthly records of the following information for emissions units P026, P029, P040 and P041:
  - a. The company identification for each coating (neat resin) employed in each emissions unit.
  - b. The number of pounds of each coating material employed in each emissions unit.
  - c. The percent styrene of each coating employed in each emissions unit.

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- d. The total organic compound emission rate for all coatings, in pounds per month.
- e. The rolling, 12-month summation of the total coating usage figures for emissions units P026, P029, P040 and P041.
- f. The rolling, 12-month summation of the OC emissions for emissions units P026, P029, P040 and P041.

Also during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative OC emissions for each calendar month for all emissions units in the group.

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#### **IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the daily and/or hourly emissions limitations in T&C A.I.1.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the usage limitations in T&C A.II.1.
3. The permittee shall submit deviation (excursion) reports which identify an exceedance of the OC content limitation in T&C A.II.3.
4. The permittee shall submit a deviation (excursion) report which identifies an exceedance of the annual Acetone (OC) emissions limit from cleanup materials.
5. The permittee shall submit quarterly reports which specify the total organic compound emissions from emissions units P026, P029, P040 and P041 combined for each calendar month based on a rolling, 12-month summation. For the first 12 calendar months of operation after issuance of this permit, the permittee shall include the combined cumulative OC emissions for each calendar month. These reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and cover the previous three calendar months.
6. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive cleanup material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
7. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

#### **V. Testing Requirements**

1. Compliance with the OC emission limitations, from coatings, for emissions unit P040 shall be demonstrated by the following:
  - a. Emission Factor: AP-42 Table 4.4-2
  - b.  $\text{\#/hr OC emissions} = \text{\#/day OC emissions} \div \text{the hours of operation}$
  - c.  $\text{\#/day OC emissions} = \text{\# resin/day} \times \text{\% styrene} \times \text{emission factor}$

Emissions Unit ID: P040

d.  $\text{Ton/yr OC emissions} = \text{Ton resin/yr} * X \% \text{ styrene} * X \text{ emission factor}$

\* Based on a rolling, 12-month summation.

2. Compliance with the Acetone (OC) emissions limitations, from cleanup materials, for emissions unit P040 shall be demonstrated by the recordkeeping in T&C A.III. 1 and 2.
3. Compliance with the usage restrictions in T&C A.II.1 shall be demonstrated by the recordkeeping in T&C A.III.1 and 2.
4. Compliance with the annual group emissions limit in T&C A.I.2.b. shall be demonstrated by the recordkeeping in T&C A.III.3 and the equation in term A.V.1.d.

## **VI. Miscellaneous Requirements**

1. Per an electronic mail from Keith Barnett of USEPA dated September 26, 2001, there are no control requirements for RTM units in the proposed MACT.

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**B. State Only Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P040 - RTM Pump 5 Building B		See Term B. III. 1.

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

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

1. The permit to install for this emissions unit P040 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s) from emissions units P026, P029, P040 and P041:

Pollutant: Styrene

TLV (ug/m3): 85,000

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

Total Maximum Hourly Emission Rate for all styrene emitting emissions units (lbs/hr): 26

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 820.8

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 2029

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.
- The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"
- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

Emissions Unit ID: P040

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

**IV. Reporting Requirements**

None

47

Cincinnati

PTI A

Emissions Unit ID: P040

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**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P041 - RTM Pump 6 Building B	OAC rule 3745-31-05(A)(3)	5.0 lbs/hr OC from coatings 40.0 lbs/day OC from coatings 19.8 lbs/day Acetone (OC) from cleanup materials 2.97 TPY Acetone (OC) from cleanup materials
	OAC rule 3745-21-07(G)	See term A.I.2.b.  The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-28	The requirements of this rule are satisfied by the requirements established in accordance with OAC rule 3745-31-05(A)(3).

**2. Additional Terms and Conditions**

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the cleanup material usage limits, OC emission limitations and compliance with the Air Toxics Policy.
- 2.b The annual OC emission limit, from coatings, employed in emissions units P026, P029, P040 and P041 combined shall not exceed 28.0 TPY, based on a rolling, 12-month

Cincinnati

PTI A

Emissions Unit ID: P041

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

summation.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Cincinnati

PTI A

Emissions Unit ID: P041

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

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Emissions of OC (Tons)</u>
1	2.5
1-2	5.0
1-3	7.5
1-4	10.0
1-5	12.5
1-6	15.0
1-7	17.5
1-8	20.0
1-9	22.5
1-10	25.0
1-11	27.5
1-12	28.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for OC emissions shall be based upon a rolling, 12-month summation of the monthly emissions.

## **II. Operational Restrictions**

1. The amount of cleanup material used in emissions unit P041 shall not exceed 3.0 gallons/day and 900 gallons/year.
2. The permittee shall employ nonphotochemically reactive cleanup materials in emissions unit P041.
3. The permittee shall employ cleanup materials in emissions unit P041 which have a maximum OC content of 6.6 pounds of OC per gallon.

## **III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information for each day for emissions unit P041:
  - a. The company identification for each coating (neat resin) and cleanup material employed.
  - b. The number of pounds of each coating material employed.

Emissions Unit ID: P041

- c. The percent styrene of each coating employed in each emissions unit.
- d. The number of gallons of cleanup material employed.
- e. The organic compound content of the cleanup material, in pounds per gallon.
- f. The total organic compound emission rate for all coatings, in pounds per day.
- g. The daily emissions from cleanup materials (d x e).
- h. The total number of hours the emissions unit was in operation.
- i. The average hourly organic compound emission rate for all coatings, in pounds per hour (f/h).
- j. A record of each liquid organic cleanup material employed in emissions unit P041 indicating whether or not the liquid organic material is photochemically reactive as defined in OAC rule 3745-21-01(C)(5).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

2. The permittee shall collect and record the following information for each month for emissions unit P041:
  - a. The total number of gallons of cleanup material employed each month.
  - b. The organic compound content of the cleanup material, in pounds per gallon.
  - c. The monthly Acetone (OC) emissions from cleanup materials (a x b).
3. In order to determine compliance with the group annual OC emission limit, the permittee shall maintain monthly records of the following information for emissions units P026, P029, P040 and P041:
  - a. The company identification for each coating (neat resin) employed in each emissions unit.
  - b. The number of pounds of each coating material employed in each emissions unit.
  - c. The percent styrene of each coating employed in each emissions unit.
  - d. The total organic compound emission rate for all coatings, in pounds per month.
  - e. The rolling, 12-month summation of the total coating usage figures for emissions units P026, P029, P040 and P041.

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

- f. The rolling, 12-month summation of the OC emissions for emissions units P026, P029, P040 and P041.

Also during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative OC emissions for each calendar month for all emissions units in the group.

**IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the daily and/or hourly emissions limitations in T&C A.I.1.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the usage limitations in T&C A.II.1.
3. The permittee shall submit deviation (excursion) reports which identify an exceedance of the OC content limitation in T&C A.II.3.
4. The permittee shall submit a deviation (excursion) report which identifies an exceedance of the annual Acetone (OC) emissions limit from cleanup materials.
5. The permittee shall submit quarterly reports which specify the total organic compound emissions from emissions units P026, P029, P040 and P041 combined for each calendar month based on a rolling, 12-month summation. For the first 12 calendar months of operation after issuance of this permit, the permittee shall include the combined cumulative OC emissions for each calendar month. These reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and cover the previous three calendar months.
6. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive cleanup material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
7. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

**V. Testing Requirements**

1. Compliance with the OC emission limitations, from coatings, for emissions unit P041 shall be demonstrated by the following:

- a. Emission Factor: AP-42 Table 4.4-2
  - b.  $\text{\#/hr OC emissions} = \text{\#/day OC emissions} \div \text{hours of operation}$
  - c.  $\text{\#/day OC emissions} = \text{\# resin/day} \times \text{\% styrene} \times \text{emission factor}$
  - d.  $\text{Ton/yr OC emissions} = \text{Ton resin/yr} \times \text{\% styrene} \times \text{emission factor}$
- \* Based on a rolling, 12-month summation.
2. Compliance with the Acetone (OC) emissions limitations, from cleanup materials, for emissions unit P041 shall be demonstrated by the recordkeeping in T&C A.III. 1 and 2.
  3. Compliance with the usage restrictions in T&C A.II.1 shall be demonstrated by the recordkeeping in T&C A.III.1 and 2.
  4. Compliance with the annual group emissions limit in T&C A.I.2.b. shall be demonstrated by the recordkeeping in T&C A.III.3 and the equation in term A.V.1.d.

## VI. Miscellaneous Requirements

1. Per an electronic mail from Keith Barnett of USEPA dated September 26, 2001, there are no control requirements for RTM units in the proposed MACT.

Cincinnati

PTI A

Emissions Unit ID: P041

**Issued: To be entered upon final issuance****B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P041 - RTM Pump 6 Building B		See Term B. III. 1.

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

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

1. The permit to install for this emissions unit P041 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s) from emissions units P026, P029, P040 and P041:

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

Emissions Unit ID: P041

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

**IV. Reporting Requirements**

None

57

Cincinnati

PTI A

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

Emissions Unit ID: P041

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None