

Synthetic Minor Determination and/or **Netting Determination**
Permit To Install **14-05808**

A. Source Description

General Polymers is a coating manufacturing facility located in Cincinnati, Ohio. The facility mixes vinyls and epoxy to produce the coatings to the customer demand. Once the coatings are mixed, they are stored in one of six storage tanks (emissions units T001 - T006).

B. Facility Emissions and Attainment Status

The annual allowable organic compound (OC) emissions for the facility will be 86.76 tons per year (TPY). The annual allowable particulate emissions for the facility will be 17.03 TPY. The facility will be synthetic minor for hazardous air pollutant (HAPs) emissions. The facility is located in Hamilton County which is non-attainment for ozone and particulate matter less than 2.5 microns in diameter (PM_{2.5}).

C. Source Emissions

OC emissions are released during the batching process of emissions unit P028. The allowable emissions for emissions unit P028 is 18.6 TPY of OC emissions. Particulate emissions are released during the charging of the batch. The allowable particulate emissions for emissions units P028 and P029 is 0.89 ton per year and 7.8 TPY, respectively.

D. Conclusion

The facility wants to remove the OC content limitation placed on emissions unit P028 resulting in an increase in OC emissions. The hourly OC emissions limitation will now equal the hourly OC potential to emit (PTE). The facility became a synthetic minor for HAP emissions after the issuance of air PTI number 14-05528 and this permit will incorporate emissions unit P028 into the synthetic minor group limitation. The facility will keep daily OC and monthly HAP emission records to demonstrate compliance with the permit limitations. The facility will accept a facility wide limit of less than 10 tons per year for each individual HAP and less than 25 tons per year for combined HAPs to avoid being subject to a federal maximum achievable control technology (MACT) regulation and Title V permit-to-operate requirements.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
HAMILTON COUNTY**

CERTIFIED MAIL

Street Address:

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

Mailing Address:
Lazarus Gov.
Center

Application No: 14-05808

Fac ID: 1431431877

DATE: 4/11/2006

General Polymers Corp
David Falk
145 Caldwell Dr
Cincinnati, OH 45216

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 **\$700** 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.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

HCDES

OH-KY-IN Reg Council of Govs

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HAMILTON COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **14-05808** FOR AN AIR CONTAMINANT SOURCE FOR
General Polymers Corp

On 4/11/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **General Polymers Corp**, located at **145 Caldwell Dr, Cincinnati**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 14-05808:

Chapter 31 modification for one Myers 7.5 horsepower mixer.

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

Brad Miller, Hamilton County Department of Environmental Services, 250 William Howard Taft Pkwy,
Cincinnati, OH 45219-2660 [(513)946-7777]



**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 14-05808

Application Number: 14-05808
Facility ID: 1431431877
Permit Fee: **To be entered upon final issuance**
Name of Facility: General Polymers Corp
Person to Contact: David Falk
Address: 145 Caldwell Dr
Cincinnati, OH 45216

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

**145 Caldwell Dr
Cincinnati, Ohio**

Description of proposed emissions unit(s):

Chapter 31 modification for one Myers 7.5 horsepower mixer.

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

General Polymers Corp
PTI Application: 14-05808
Issued: To be entered upon final issuance
Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 1431431877

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections,

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conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental

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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.

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

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

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Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PE/PM10	8.7
OC	18.6

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	OAC rule 3745-17-07(A)(1)
P028 - Myers 7.5 HP Mixer	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-07(B)(1)
		OAC rule 3745-17-08(B)
		OAC rule 3745-17-11(B)
	OAC rule 3745-31-05(C) (Synthetic minor to avoid both a MACT regulation and Title V permitting requirements.)	

Applicable Emissions
Limitations/Control Measures

Particulate emissions (PE)* and Particulate Matter emissions 10 microns and less in diameter (PM10) from this emissions unit shall not exceed 0.51 pound per hour and 0.89 ton per year.

Organic compound (OC) emissions from this emissions unit shall not exceed 10.6 pounds per hour and 18.6 tons per year.

* PE = PM10

The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), OAC rule 3745-17-07(B)(1), OAC rule 3745-17-08(B) and OAC rule 3745-31-05(C).

See term and condition A.2.e.

See term and condition A.2.b.

See term and condition A.2.c.

The permittee shall minimize or eliminate visible fugitive particulate emissions by the use of a cover and dust collector.

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

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 compliance with the emissions limitations, opacity limitation and use of covers and a fabric filter.
- 2.b** Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six- minute average, except as specified by rule.
- 2.c** Fugitive visible particulate emissions shall not exceed 20 percent opacity, as a three-minute average.
- 2.d** The hourly OC, PE and PM10 emissions limitations specified in Section A.1. are based upon the emissions unit's Potential To Emit (PTE). Therefore, no records are required to demonstrate compliance with these limitations.
- 2.e** The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units P006 (Shar Mixer), P007 (Hockmeyer Mixer 1), P008 (Hockmeyer Mixer 2), P010 (Hockmeyer HV-15 Mixer), P011 (Cowles Mixer), P013 (Epoxy Mixer), P017 (Hardener Tank), P021 (Tinting Area) P022 (Granule Mixer), P025 (Solvent Reclaim Still), P026 (Schold Mixer1), P027 (Schold Mixer 2), P028 (Myers Mixer), P029 (1,200 gallon epoxy clear base mixer), P030 (700 gallon reactor), P031 (300 gallon reactor), P032 (2,500 gallon reactor), T001 (6,134 gallon storage tank #1), T002 (5,086 gallon storage tank #2), T003 (5,086 gallon storage tank #3), T004 (6,000 gallon storage tank #4), T005 (6,000 gallon storage tank #5), T006 (6,134 gallon storage tank #6), and any registration status and/or permit exempt emissions units shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance with this limitation upon permit issuance.

General**PTI A****Issued: To be entered upon final issuance**Emissions Unit ID: **P028****B. Operational Restrictions**

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for all organic compounds used in the formulation of finished coatings for this emissions unit:
 - a. The name and identification of each batch of coating produced.
 - b. The OC content of each batch of coating, in pounds per gallon.
 - c. The total amount of all organic material used in each batch, in pounds.
 - d. The total combined amount of all organic material used during the month for all batches, in pounds.
 - e. The total combined monthly OC emissions, in tons per month. This calculation shall be based on the emissions calculation methodology submitted in permit to install application 14-05808 on January 19, 2006.

These records shall be summarized at the end of each calendar year.

2. The permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.e:
 - a. The name and identification number of each batch of coating produced containing a HAP(s).
 - b. The number of pounds of each batch of coating produced.
 - c. The individual Hazardous Air Pollutant (HAP) content for each HAP per pound of coating produced in pounds of individual HAP per pound of coating.
 - d. The total combined HAP content of each coating in pounds of combined HAPs per pound of coating [sum all the individual HAP contents from (c)].
 - e. The total individual HAP emissions for each HAP from all coatings produced in pounds or tons per month. This calculation shall be based on the emissions

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Issue

Facility ID: 1431431877

Emissions Unit ID: P028

calculation methodology submitted in permit to install application 14-05808 on
January 19, 2006.

Issued: To be entered upon final issuance

- f. The total combined HAP emissions from all coatings produced in pounds or tons per month. This calculation shall be based on the emissions calculation methodology submitted in permit to install application 14-05808 on January 19, 2006.
- g. The updated rolling, 12-month summation for individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
- h. The updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

3. The permit to install for this emissions unit (P028) was evaluated based on the actual 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):

Pollutant: styrene

TLV (ug/m3): 85,000

Maximum Hourly Emission Rate (lbs/hr): 10.6

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 957

MAGLC (ug/m3): 2028

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

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, 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 still satisfy the "Air Toxic Policy":

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

Emissions Unit ID: **P028**

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

D. Reporting Requirements

1. The permittee shall submit annual reports which specify the total organic compound emissions from this emissions unit. These reports shall be submitted to the Hamilton County Department of Environmental Services by January 30 of each year and cover the previous calendar year.
2. The permittee shall submit quarterly deviation reports which identify any exceedance of the HAP emission limitations set forth in term A.2.e. If no deviations occurred during the reporting period, the permittee shall state so in the report.

The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively.)

If no exceedances occurred, the permittee shall state so in the report.

E. Testing Requirements

1. Compliance with the emissions limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emissions Limitation:
10.6 pounds per hour of OC; 18.6 tons per year of OC.

Applicable Compliance Method:

The hourly OC emission rate is based on the emissions unit's potential to emit. The potential to emit was based on the emissions calculation methodology submitted in permit to install application 14-05808 on January 19, 2006. Compliance with the annual organic compound emissions limitation in term A.1. shall be based upon the record keeping requirements as specified in Section C.1.

General
PTI A

Emissions Unit ID: **P028**

Issued: To be entered upon final issuance

- b. Emissions Limitation:
0.51 pound per hour of PE/PM10; 0.89 ton per year of PE/PM10.

Applicable Compliance Method:

The hourly PE rate is based on the emissions unit's potential to emit. The potential to emit was calculated by: $\{[(\text{maximum production rate (solids basis) of 998 pounds per hour}) \times (1.0\% \text{ AP-42 emission factor}) \times (95\% \text{ capture efficiency}) \times (1-0.99 \text{ control efficiency})] + [(\text{maximum production rate (solids basis) of 998 pounds per hour}) \times (1.0\% \text{ AP-42 emission factor}) \times (5\% \text{ uncontrolled})]\}$.

The annual PE emissions rate is based on the emissions unit's potential to emit. The emissions unit is assumed to be in compliance as long as compliance with the hourly emissions rate limitation is maintained. The annual PE emissions rate was calculated by: $\{[(0.51 \text{ pound per batch}) / (2.5 \text{ hours per batch})] \times (8670 \text{ hours per year}) / (2000 \text{ pounds per ton})\}$.

All PE is assumed to be PM10.

**General
PTI A**Emissions Unit ID: **P028****Issued: To be entered upon final issuance**

- c. Emissions Limitation:
Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, as such Appendix existed on July 1, 2002.

- d. Emissions Limitation:

Fugitive visible particulate emissions shall not exceed 20 percent opacity, as a three-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, and the procedures specified in OAC rule 3745-17-03(B)(3).

- e. Emissions Limitations:
9.9 TPY for any single HAP and 24.9 TPY for combined HAPs.

Applicable Compliance Method:

Compliance with the HAP emissions limitations in term and condition A.2.e shall be demonstrated by the record keeping requirements specified in term and condition C.2.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A., B., C.1., C.2., D. and E.
2. The terms and conditions of this permit to install shall supersede the terms and conditions of Permit to Install 14-05528 as issued on February 19, 2004.

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P029 - 1,200 gallon epoxy clear base mixer	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE)* and Particulate Matter emissions 10 microns and less in diameter (PM10) from this emissions unit shall not exceed 7.12 pounds per hour and 7.8 tons per year. * PE = PM10 The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), OAC rule 3745-17-07(B)(1), and OAC rule 3745-17-08(B).
	OAC rule 3745-17-07(A)(1)	See term and condition A.2.b.
	OAC rule 3745-17-07(B)(1)	See term and condition A.2.c.
	OAC rule 3745-17-08(B)	The permittee shall minimize or eliminate visible fugitive particulate emissions by the use of a cover and dust collector.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than

General**PTI A**Emissions Unit ID: **P029****Issued: To be entered upon final issuance**

the emission limitation
established pursuant to 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 compliance with the emissions limitations, opacity limitation and use of covers and a fabric filter.
- 2.b** Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six- minute average, except as specified by rule.
- 2.c** Fugitive visible particulate emissions shall not exceed 20 percent opacity, as a three-minute average.
- 2.d** The hourly and annual PE-PM10 emissions limitations outlined are based upon the emissions unit's Potential To Emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.

B. Operational Restrictions

- 1. This emissions unit shall not process coatings containing volatile organic compounds (VOC), as defined in OAC rule 3745-21-01(B)(6).

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall collect and record the following information for this emissions unit on a daily basis when any coatings containing VOC are produced in this emissions unit:
 - a. The company identification for each batch produced.
 - b. The total amount of all VOC used in each batch, in pounds.

D. Reporting Requirements

- 1. The permittee shall notify the Hamilton County Department of Environmental Services in writing for any deviation of the operational restriction listed in term B.1. A copy of such record shall be sent to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.

General

PTI A

Issued: To be entered upon final issuance

Emissions Unit ID: **P029**

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emissions Limitation:
7.12 lb/hr PE/PM10; 7.8 TPY PE/PM10

General

PTI A

Emissions Unit ID: P029

Issued: To be entered upon final issuance

Applicable Compliance Method:

The hourly PM-PM10 emissions rate is based on the emissions unit's potential to emit. The potential to emit was calculated by: $\{[(\text{maximum production rate of 11971 pounds per hour}) \times (1.0\% \text{ AP-42 emission factor}) \times (95\% \text{ capture efficiency}) \times (1-0.99 \text{ control efficiency})] + [(\text{maximum production rate of 11971 pounds per hour}) \times (1.0\% \text{ AP-42 emission factor}) \times (0.05 \text{ uncontrolled})]\}$.

The annual PE emission rate is based on the emission units potential to emit. The emissions unit is assumed to be in compliance as long as compliance with the hourly rate is maintained. The annual PE emission rate was calculated by: $\{[(7.12 \text{ pounds per batch}) / (4.0 \text{ hours per batch})] \times (8670 \text{ hours per year}) / (2000 \text{ pounds per ton})\}$.

b. Emissions Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method, as such Appendix existed on July 1, 2002.

c. Emissions Limitation:

Fugitive visible particulate emissions shall not exceed 20 percent opacity, as a three-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, and the procedures specified in OAC rule 3745-17-03(B)(3).

2. Compliance with the VOC content limitation in term B.1. shall be based upon the record keeping requirements as specified in Section C.1. Formulation data or USEPA method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the VOC contents of the coatings.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A. through E.

General Polymers Corp
PTI Application: 14-0528
Issue

Facility ID: 1431431877

Emissions Unit ID: P029

2. The terms and conditions of this permit to install shall supersede the terms and conditions of Permit to Install 14-05528 as issued on February 19, 2004.