

Synthetic Minor Determination and/or Netting Determination

Permit To Install 16-02289

A. Source Description

ITW Ride Quality Products is requesting a federally enforceable limitation on the hours of operation for this emission unit. This emissions unit will be limited to 16 hours of operation per day, or 5,840 hours of operation annually. Annual throughput rates are based on a maximum 5,840 hours per year.

B. Facility Emissions and Attainment Status

The requested operational limit is an annual restriction based on a daily operating restriction. The short term emissions (lbs/hr) limitation is based on maximum hourly throughput. ITW Ride Quality Products will record the hours of operation of this unit on an annual, and daily basis.

C. Source Emissions

Due to the operational restriction listed above for this emission unit, total facility "potential to emit" (with applicable control devices) will be limited to:

| | |
|--|--------------|
| Volatile Organic Compounds (VOCs) | 49.9 tons/yr |
| Combined Hazardous Air Pollutants (HAP) ¹⁸⁸ | 24.9 tons/yr |
| Individual Hazardous Air Pollutant (HAP) ¹ | 9.9 tons/yr |

D. Conclusion

By employing operational restriction listed above the facility can maintain operation capacity and flexibility and limit facility wide emissions to less than Title V threshold levels.



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.
Center

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

CERTIFIED MAIL

Application No: 16-02289

DATE: 5/22/2003

ITW Ride Quality Products
Don Beeman
PO Box 1869 1624 Englewood Ave
Akron, OH 443054233

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 **\$200** 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

ARAQMD

Akron Metropolitan Area Transportation Study

WV

PA

SUMMIT COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 16-02289 FOR AN AIR CONTAMINANT SOURCE FOR
ITW RIDE QUALITY PRODUCTS**

On 5/22/2003 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **ITW Ride Quality Products**, located at **1624 Englewood Ave, Akron, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 16-02289:

Modification to Emissions Unit K001, Increase in Emissions, Synthetic Minor Strategy, Replaces PTI 16-1060 issued 8/21/91.

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.

Lynn Malcolm, Akron Regional Air Quality Management District, 146 South High Street, Room 904, Akron, OH 44308 [(330)375-2480]



**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 16-02289

Application Number: 16-02289
APS Premise Number: 1677010265
Permit Fee: **To be entered upon final issuance**
Name of Facility: ITW Ride Quality Products
Person to Contact: Don Beeman
Address: PO Box 1869 1624 Englewood Ave
Akron, OH 443054233

Location of proposed air contaminant source(s) [emissions unit(s)]:
**1624 Englewood Ave
Akron, Ohio**

Description of proposed emissions unit(s):
Modification to Emissions Unit K001, Increase in Emissions, Synthetic Minor Strategy, Replaces PTI 16-1060 issued 8/21/91.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS**A. Permit to Install General Terms and Conditions****1. Compliance Requirements**

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

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

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

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

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

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

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

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

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

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

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete

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

Emissions Unit ID: **K001**

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

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

| <u>Pollutant</u> | <u>Tons Per Year</u> |
|--------------------|----------------------|
| Organic Compounds | 11.7** |
| Xylene | 5.77* |
| Ethyl Benzene | 1.43* |
| Methyl Amyl Ketone | 5.74 |

* HAP

** includes the individual compounds emitted.

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

A. Applicable Emissions Limitations and/or Control Requirements

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

| <u>Operations, Property, and/or Equipment</u> | <u>Applicable Rules/Requirements</u> | <u>Applicable Emissions Limitations/Control Measures</u> |
|---|--------------------------------------|--|
| K001 - Devilbiss Paint Booth | OAC rule 3745-31-05(A)(3) | Volatile Organic compound (VOC) emissions shall not exceed 4.18 pounds per hour and 11.7 tons per year. |
| | | The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-21-09(U)(1)(c). |
| | OAC rule 3745-21-09(U)(1)(c) | See 2.a below |
| | OAC rule 3745-35-07(B) | See 2.b. below |
| | | The total facility-wide VOC emissions shall not exceed 49.9 tons per year, based on a rolling 12-month summation of the monthly emissions. |
| | | See 2.c. below |

2. Additional Terms and Conditions

- 2.a The hourly VOC emissions were developed based on the potential to emit at the maximum coating application rate. Therefore record keeping for hourly emissions limitations is not necessary.

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- 2.b** The permittee shall not employ any coating that exceeds 3.5 pounds VOC per gallon of coating, excluding water and exempt solvents (daily volume-weighted average).
- 2.c** The total annual Xylene (HAP)¹ emissions from this facility shall not exceed 9.9 tons per rolling 12-month period, and 24.0 tons per rolling 12-month period for combined HAP emissions.

¹A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the adhesive/coatings and clean up materials. This information does not have to be kept on a line-by-line basis.

B. Operational Restrictions

1. The permittee has agreed to accept limitations on daily operating hours to keep the facility-wide Xylene emission rate to less than 9.9 tons per year.
2. The permittee shall not operate this emissions unit for more than 16 hrs in any day, nor use more than 16.0 gallons of coating per day based on the maximum coating application rate of 1 gallon per coating applied per hour.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the line:
 - a. The name and identification number of each adhesive/coating, as applied;
 - b. The volume in gallons (excluding water and exempt solvents) of each adhesive/coating, as applied;
 - c. The VOC content (excluding water and exempt solvents) of each adhesive/coating, as applied;
 - d. The daily volume-weighted average VOC content of all adhesive/coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{VOC,2}$.
 - e. The name and identification of each cleanup material employed;

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- f. The volume in gallons of each cleanup material; and
 - g. The number of hours the emissions unit was in operation.
2. The permittee shall collect and record the following information for each month for the facility:
- a. The name and identification number for each adhesive/coating, as applied;
 - b. The individual Hazardous Air Pollutant (HAP)¹ content for each HAP of the adhesive/coatings in pounds of individual HAP per gallon of adhesive/coating, as applied;

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- c. The total combined HAP content for each HAP of the adhesive/coatings in pounds of combined HAPs per gallon, as applied (sum of all the individual HAP contents from b);
 - d. The number of gallons of each adhesive/coating employed;
 - e. The name and identification number for each cleanup material employed;
 - f. The individual Hazardous Air Pollutant (HAP)¹ content for each HAP of the clean up material in pounds of individual HAP per gallon of clean up material, as applied;
 - g. The total combined HAP content for each clean up material in pounds of combined HAPs per gallon of clean up material, as applied (sum of all the individual HAP contents from f);
 - h. The number of gallons of each clean up material employed;
 - i. The total individual HAP emissions for each HAP from all adhesive/coatings and clean up materials employed, in pounds or tons per month and pounds or tons per rolling 12-month period (for each HAP the sum of b times d for each adhesive/coatings and the sum of f times h for each clean up material);
 - j. The total combined HAP emissions from all adhesive/coatings and clean up materials employed, in pounds or tons per month and pounds or tons per rolling 12-month period (the sum of c times d for each adhesive/coatings and the sum of g times h for each clean up material); and
 - k. The total VOC emissions from all adhesive/coatings and clean up materials employed in tons per rolling 12-month period.
3. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions for this emissions unit:
 - a. The VOC content of each cleanup material, in pounds per gallon; and
 - b. The total VOC emissions from all adhesive/coatings and cleanup materials, in pounds or tons.

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the daily volume-weighted average VOC

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content exceeds the applicable limitation. 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.

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2. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the emissions unit was operated for more than 16 hours and the actual hours operated for each such day;
 - b. An identification of each day during which the emissions unit use more than 16.0 gallons of coating per day and the actual number of gallons used for each such day;
 - c. An identification of all exceedances of the rolling, 12 month emission facility-wide limitations for xylene (HAP) and combined HAPs levels; and
 - d. An identification of all exceedances of the rolling, 12 month emission facility-wide limitations for VOC.
3. These deviation (excursion) reports shall be submitted in accordance with the requirements specified in General Term and Condition A.2 of this permit.
4. The permittee shall submit annual reports to the Akron Regional Air Quality Management District which summarizes the total facility-wide emissions of organic compounds, individual HAPs, and combined HAPs.
5. The reports annual shall be submitted by March 15 of each year and shall cover the previous calendar year's activities.

E. Testing Requirements

1. Compliance with the emission limitation in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
3.5 pounds VOC per gallon of coating, excluding water and exempt solvents (daily volume-weighted average).

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C and the following: USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If an owner or operator determines that Method 24 or 24A in 40 CFR Part 60, Appendix A cannot be used for a particular coating or ink, the permittee

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shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A."

- b. Emission Limitation:
4.18 pounds of VOC/hr. and
11.7 tons of VOC/yr.
- Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section C.
- c. Emission Limitation:

9.95 tons per rolling, 12-month period of HAP facility wide emissions
24.0 ton per year of all HAPs facility wide emissions
- Applicable Compliance Method:

Compliance with the 9.9 and 24.0 tons per rolling 12-month period of HAP facility wide emissions limitations shall be demonstrated through record keeping required in term C.
- Xylene and Ethyl Benzene are the only HAPs employed in this emissions unit and are the only HAPs requiring record keeping.
- d. Operational Restriction:

16 hours of operation per day
16 gallons of coating employed per day
- Applicable Compliance Method:

Applicable Compliance Method: Compliance shall be based upon the monitoring and record keeping requirements specified in Section C.
- e. Emission Limitation:

49.9 tons per rolling, 12-month period of VOC facility wide emissions
- Applicable Compliance Method:

Compliance with the 49.9 tons per rolling 12-month period of VOC facility wide emissions limitations shall be demonstrated through record keeping required in term C.

F. Miscellaneous Requirements

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Emissions Unit ID: **K001****Issued: To be entered upon final issuance**

1. The permit to install for this emissions unit (P003-P017) was evaluated based upon actual materials (typical ingredients and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air 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 all of the emissions units included in this permit to install 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 was then compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling:

Pollutant: Xylene

TLV (mg/m3): 434.19 (Converted from the TWA)

Maximum Hourly Emission Rate (lbs/hr): 2.06

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 570.7

MAGLC (ug/m3): 10,337

Pollutant: Ethyl Benzene

TLV (mg/m3): 434.19 (Converted from the TWA)

Maximum Hourly Emission Rate (lbs/hr): 0.51

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 140.5

MAGLC (ug/m3): 10,337

Pollutant: Methyl Amyl Ketone

TLV (mg/m3): 104.47 (Converted from the TWA)

Maximum Hourly Emission Rate (lbs/hr): 2.05

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 396.83

MAGLC (ug/m3): 2,487.6

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 with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of

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Governmental Industrial Hygienists (ACGIH)," than the TLV value specified above;

- 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.).

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If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.