



State of Ohio Environmental Protection Agency

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

**CERTIFIED MAIL**

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 16-01945**

**DATE: 4/12/2001**

Steere Enterprises Inc  
Clint Irons  
285 Commerce St  
Tallmadge, OH 44278

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

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

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

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

Very truly yours,

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

CC: USEPA

ARAQMD



**Permit To Install**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**FINAL PERMIT TO INSTALL 16-01945**

Application Number: 16-01945  
APS Premise Number: 1677120007  
Permit Fee: **\$2800**  
Name of Facility: Steere Enterprises Inc  
Person to Contact: Clint Irons  
Address: 285 Commerce St  
Tallmadge, OH 44278

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**285 Commerce St**  
**Tallmadge, Ohio**

Description of proposed emissions unit(s):  
**This PTI is a modification of PTI 16-1709, which is a permit for six plastisol dip molding units, P004 through P009. PTI 16-01945 includes the addition of a seventh plastisol dip molding unit, P010.**

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Director

## Part I - GENERAL TERMS AND CONDITIONS

### A. Permit to Install General Terms and Conditions

#### 1. Compliance Requirements

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

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

The permittee shall submit required reports in the following manner:

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

#### 3. Records Retention Requirements

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

#### 4. Inspections and Information Requests

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

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

**5. Scheduled Maintenance/Malfunction Reporting**

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

**6. Permit Transfers**

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

**7. Air Pollution Nuisance**

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

**8. Termination of Permit to Install**

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

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

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

Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

**10. Public Disclosure**

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

**11. Applicability**

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

**12. Best Available Technology**

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

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

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

Steere Enterprises Inc  
 PTI Application: 16-01945  
 Issued: 4/12/2001

Facility ID: 1677120007

#### 14. Construction Compliance Certification

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

#### 15. Fees

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

#### B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	11.25
PM	0.265
NOx	3.508
CO	2.947
S02	0.021

**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 Limitations/Control Measures</u>	<u>Emissions</u>
Plastisol dip molding with electric oven - unit #4 with a capacity of 300 lbs/hr	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with requirements of OAC rule 3745-21-07(G)(2) and 3745-31-05(D).	
		16.8 lbs/hr of organic compounds (OC);	
		1.8 lbs/hr of Stoddard solvent*	
	OAC rule 3745-31-05(D)		*The Stoddard solvent is included in the allowable mass emissions for OC.
	OAC rule 3745-21-07(G)(2)		11.25 tons of OC per rolling , 12-month period for P004 through P010.
			Exempt from the requirements of this rule pursuant to term B.1. below.

**2. Additional Terms and Conditions**

2.a None

**B. Operational Restrictions**

1. The permittee shall only employ materials in this emissions unit which meet the following criteria either pursuant to OAC rule 3745-21-07(G)(9)(c) or pursuant to OAC rule 3745-21-07(G)(9)(d):

OAC rule 3745-21-07(G)(9)(c):

- a. the volatile content of such material consists only of water and liquid organic material; and
- b. the liquid organic material comprises not more than twenty percent of said volatile content; and
- c. the volatile content is not a photochemically reactive material.

OAC rule 3745-21-07(G)(9)(d):

- d. the volatile content of such material does not exceed twenty percent by volume of said material; and
  - e. the volatile content is not a photochemically reactive material.
2. The maximum annual solvent usage for P004, P005, P006, P007, P008, P009 and P010 shall not exceed 18,000 pounds per year, based upon a rolling, 12-month summation of the solvent usage figures.

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

Month(s)	Maximum Allowable Cumulative Solvent Usage
1	1500 pounds
1-2	3000 pounds
1-3	4500 pounds
1-4	6000 pounds
1-5	7500 pounds
1-6	9000 pounds
1-7	10,500 pounds
1-8	12,000 pounds
1-9	13,500 pounds
1-10	15,000 pounds
1-11	16,500 pounds

1-12 18,000 pounds

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual solvent usage limitation shall be based upon a rolling, 12-month summation of the solvent usage figures.

3. The additive organic compound (OC) volatiles from P004, P005, P006, P007, P008, P009, and P010 shall not exceed 4104 pounds per year, based upon a rolling, 12-month summation of the monthly additive OC volatiles usage.

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

Month(s)	Maximum Allowable Cumulative Additive OC volatiles Usage
1	342 pounds
1-2	684 pounds
1-3	1026 pounds
1-4	1368 pounds
1-5	1710 pounds
1-6	2052 pounds
1-7	2394 pounds
1-8	2736 pounds
1-9	3078 pounds
1-10	3420 pounds
1-11	3762 pounds
1-12	4104 pounds

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual additive OC volatiles limitation shall be based upon a rolling, 12-month summation of the monthly amount of additive OC volatiles usage figures.

### C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain records which document that each material employed in this emissions unit meets the criteria specified in B.1 above.

2. The permittee shall maintain monthly records of the following information:
  - a. the solvent usage, in pounds;
  - b. the additive OC volatiles usage, in pounds; and
  - c. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the solvent usage figures and the additive OC volatiles usage figures.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative solvent usage and the cumulative additive OC volatiles usage for each calendar month.

- d. the Stoddard solvent weight percent in the plastisol.
  - e. the plastisol production rate.
3. The permit to install for this emissions unit (P004) 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 Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Stoddard solvent (additive OC)

TLV (mg/m<sup>3</sup>): 572

Maximum Hourly Emission Rate (lbs/hr): 1.8

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 421.1

MAGLC (ug/m<sup>3</sup>): 13,628

4. 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

"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 (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.).

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.

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

#### D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify any material employed which does not meet the criteria in B.1 above. The report shall be submitted within 45 days of the occurrence.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month usage limitations for solvent and additive OC volatiles and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative usage levels. These reports are by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

#### E. Testing Requirements

1. Compliance with the emission limitations in A.1 above shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
  
lbs/hr of organic compounds (OC)  
  
Applicable Compliance Method:  
  
Compliance shall be determined by multiplying the maximum weight percent of solvent in the plastisol by the maximum production rate, or use OAC rule 3745-21-10(C).
  - b. Emission Limitation:  
  
1.8 lbs/hr of Stoddard solvent (additive OC)

#### Applicable Compliance Method

Multiply the maximum weight percent of Stoddard solvent in the plastisol by the maximum production rate.

**c.** Emission Limitation:

11.25 tons of OC per rolling , 12-month period for P004 through P010.

#### Applicable Compliance Method:

Compliance shall be determined by totaling the following:

**i.** plastisol emissions

Monthly record keeping of the solvent and additive OC volatiles usage for P004, P005, P006, P007, P008, P009, and P010 as required in C.2 and C.3. above.

**ii.** natural gas combustion

Multiply the AP-42 organic compound emission factor of 5.5 pounds of organic compound emissions per million cubic feet of natural gas fired by the maximum yearly amount of natural gas fired and divided by 2000 lbs/ton.

## **F. Miscellaneous Requirements**

1. This permit to install shall supersede all the air pollution control requirements for these emissions units previously contained in permit to install number 16-1709, as issued on March 10, 1999.
2. In accordance with OAC rule 3745-31-05(D), sections II.A.1, II.B.2, II.B.3, II.C.1, II.C.2., II.D.1, and II.D.2. of these terms and conditions constitute the federally enforceable portions of this permit.

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]**

**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>
Plastisol dip molding with electric oven - unit #5 with a capacity of 100 lbs/hr	OAC rule 3745-31-05(A)(3)  OAC rule 3745-31-05(D)  OAC rule 3745-21-07(G)(2)	The requirements of this rule also include compliance with requirements of OAC rule 3745-21-07(G)(2) and 3745-31-05(D).  5.6 lbs/hr of organic compounds (OC);  0.6 lbs/hr of Stoddard solvent*  *The Stoddard solvent is included in the allowable mass emissions for OC.  11.25 tons of OC per rolling , 12-month period for P004 through P010.  Exempt from the requirements of this rule pursuant to term B.1. below.

**2. Additional Terms and Conditions**

2.a None

**B. Operational Restrictions**

- 1. The permittee shall only employ materials in this emissions unit which meet the following criteria either pursuant to OAC rule 3745-21-07(G)(9)(c) or pursuant to OAC rule 3745-21-07(G)(9)(d):

OAC rule 3745-21-07(G)(9)(c):

- a. the volatile content of such material consists only of water and liquid organic material; and
- b. the liquid organic material comprises not more than twenty percent of said volatile content; and
- c. the volatile content is not a photochemically reactive material.

OAC rule 3745-21-07(G)(9)(d):

- d. the volatile content of such material does not exceed twenty percent by volume of said material; and
- e. the volatile content is not a photochemically reactive material.

- 2. The maximum annual solvent usage for P004, P005, P006, P007, P008, P009 and P010 shall not exceed 18,000 pounds per year, based upon a rolling, 12-month summation of the solvent usage figures.

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

Month(s)	Maximum Allowable Cumulative Solvent Usage
1	1500 pounds
1-2	3000 pounds
1-3	4500 pounds
1-4	6000 pounds
1-5	7500 pounds
1-6	9000 pounds
1-7	10,500 pounds
1-8	12,000 pounds
1-9	13,500 pounds
1-10	15,000 pounds

**Stere**  
**PTI A**  
**Issued: 4/12/2001**

Emissions Unit ID: **P005**

1-11	16,500 pounds
1-12	18,000 pounds

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual solvent usage limitation shall be based upon a rolling, 12-month summation of the solvent usage figures.

- The additive organic compound (OC) volatiles from P004, P005, P006, P007, P008, P009, and P010 shall not exceed 4104 pounds per year, based upon a rolling, 12-month summation of the monthly additive OC volatiles usage.

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

Month(s)	Maximum Allowable Cumulative Additive OC volatiles Usage
1	342 pounds
1-2	684 pounds
1-3	1026 pounds
1-4	1368 pounds
1-5	1710 pounds
1-6	2052 pounds
1-7	2394 pounds
1-8	2736 pounds
1-9	3078 pounds
1-10	3420 pounds
1-11	3762 pounds
1-12	4104 pounds

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual additive OC volatiles limitation shall be based upon a rolling, 12-month summation of the monthly amount of additive OC volatiles usage figures.

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

- The permittee shall maintain records which document that each material employed in this

emissions unit meets the criteria specified in B.1 above.

2. The permittee shall maintain monthly records of the following information:
  - a. the solvent usage, in pounds;
  - b. the additive OC volatiles usage, in pounds; and
  - c. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the solvent usage figures and the additive OC volatiles usage figures.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative solvent usage and the cumulative additive OC volatiles usage for each calendar month.

- d. the Stoddard solvent weight percent in the plastisol.
  - e. the plastisol production rate.
3. The permit to install for this emissions unit (P005) 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 Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Stoddard solvent (additive OC)

TLV (mg/m<sup>3</sup>): 572

Maximum Hourly Emission Rate (lbs/hr): 0.6

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 228.7

MAGLC (ug/m<sup>3</sup>): 13,628

Emissions Unit ID: P005

4. 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 still 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 (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.).

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.

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

#### D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify any material employed which does not meet the criteria in B.1 above. The report shall be submitted within 45 days of the occurrence.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month usage limitations for solvent and additive OC volatiles and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative usage levels. These reports are by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

#### E. Testing Requirements

1. Compliance with the emission limitations in A.1 above shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
  
5.6 lbs/hr of organic compounds (OC)  
  
Applicable Compliance Method:  
  
Compliance shall be determined by multiplying the maximum weight percent of solvent in the plastisol by the maximum production rate, or use OAC rule 3745-21-10(C).
  - b. Emission Limitation:  
  
0.6 lbs/hr of Stoddard solvent (additive OC)

Applicable Compliance Method

Multiply the maximum weight percent of Stoddard solvent in the plastisol by the maximum production rate.

**c.** Emission Limitation:

11.25 tons of OC per rolling, 12-month period for P004 through P010

Applicable Compliance Method:

Compliance shall be determined by totaling the following:

**i.** plastisol emissions

Monthly record keeping of the solvent and additive OC volatiles usage for P004, P005, P006, P007, P008, P009, and P010 as required in C.2 and C.3. above.

**ii.** natural gas combustion

Multiply the AP-42 organic compound emission factor of 5.5 pounds of organic compound emissions per million cubic feet of natural gas fired by the maximum yearly amount of natural gas fired and divided by 2000 lbs/ton.

**F. Miscellaneous Requirements**

1. This permit to install shall supersede all the air pollution control requirements for these emissions units previously contained in permit to install number 16-1709, as issued on March 10, 1999.
2. In accordance with OAC rule 3745-31-05(D), sections II.A.1, II.B.2, II.B.3, II.C.1, II.C.2, II.C.3, II.D.1, and II.D.2 of these terms and conditions constitute the federally enforceable portions of this permit.

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]**

**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>
Plastisol dip molding with natural gas oven - unit #6 with a capacity of 370 lbs/hr	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with requirements of OAC rule 3745-21-07(G)(2) and 3745-31-05(D).
		20.73 lbs/hr of organic compounds (OC);
		2.22 lbs/hr of Stoddard solvent*
		*The Stoddard solvent is included in the allowable mass emissions for OC.
		0.057 tpy of particulate emissions
		0.756 tpy of nitrogen oxides (NOx)
		0.635 tpy of carbon monoxide (CO)
		0.005 tpy of sulfur dioxide (SO <sub>2</sub> )
	OAC rule 3745-31-05(D)	11.25 tons of OC per rolling, 12-month period for P004 through P010
	OAC rule 3745-21-07(G)(2)	Exempt from the requirements of this rule pursuant to term B.1 below.

**2. Additional Terms and Conditions**

**2.a** None

**B. Operational Restrictions**

**1.** The permittee shall only employ materials in this emissions unit which meet the following criteria either pursuant to OAC rule 3745-21-07(G)(9)(c) or pursuant to OAC rule 3745-21-07(G)(9)(d):

OAC rule 3745-21-07(G)(9)(c):

- a.** the volatile content of such material consists only of water and liquid organic material; and
- b.** the liquid organic material comprises not more than twenty percent of said volatile content; and
- c.** the volatile content is not a photochemically reactive material.

OAC rule 3745-21-07(G)(9)(d):

- d.** the volatile content of such material does not exceed twenty percent by volume of said material; and
- e.** the volatile content is not a photochemically reactive material.

**2.** The maximum annual solvent usage for P004, P005, P006, P007, P008, P009 and P010 shall not exceed 18,000 pounds per year, based upon a rolling, 12-month summation of the solvent usage figures.

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

Month(s)	Maximum Allowable Cumulative Solvent Usage
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1	1500 pounds
1-2	3000 pounds
1-3	4500 pounds
1-4	6000 pounds
1-5	7500 pounds
1-6	9000 pounds
1-7	10,500 pounds
1-8	12,000 pounds
1-9	13,500 pounds
1-10	15,000 pounds
1-11	16,500 pounds
1-12	18,000 pounds

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual solvent usage limitation shall be based upon a rolling, 12-month summation of the solvent usage figures.

- The additive organic compound (OC) volatiles from P004, P005, P006, P007, P008, P009, and P010 shall not exceed 4104 pounds per year, based upon a rolling, 12-month summation of the monthly additive OC volatiles usage.

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

Month(s)	Maximum Allowable Cumulative Additive OC volatiles Usage
1	342 pounds
1-2	684 pounds
1-3	1026 pounds
1-4	1368 pounds
1-5	1710 pounds
1-6	2052 pounds
1-7	2394 pounds
1-8	2736 pounds
1-9	3078 pounds
1-10	3420 pounds
1-11	3762 pounds

1-12

4104 pounds

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual additive OC volatiles limitation shall be based upon a rolling, 12-month summation of the monthly amount of additive OC volatiles usage figures.

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

1. The permittee shall maintain records which document that each material employed in this emissions unit meets the criteria specified in B.1 above.
2. The permittee shall maintain monthly records of the following information:
  - a. the solvent usage, in pounds;
  - b. the additive OC volatiles usage, in pounds; and

- c. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the solvent usage figures and the additive OC volatiles usage figures.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative solvent usage and the cumulative additive OC volatiles usage for each calendar month.

- d. the Stoddard solvent weight percent in the plastisol.
  - e. the plastisol production rate.
3. The permit to install for this emissions unit (P006) 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 Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Stoddard solvent (additive OC)

TLV (mg/m<sup>3</sup>): 572

Maximum Hourly Emission Rate (lbs/hr): 2.22

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 778.4

MAGLC (ug/m<sup>3</sup>): 13,628

4. 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:

Emissions Unit ID: **P006**

- 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.).

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.

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

#### **D. Reporting Requirements**

- 1. The permittee shall submit deviation (excursion) reports which identify any material employed which does not meet the criteria in B.1 above. The report shall be submitted within 45 days of the occurrence.
- 2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month usage limitations for solvent and additive OC volatiles and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the

maximum allowable cumulative usage levels. These reports are by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

## E. Testing Requirements

1. Compliance with the emission limitations in A.1 above shall be determined in accordance with the following methods:

- a. Emission Limitation:

20.73 lbs/hr of organic compounds (OC)

Applicable Compliance Method:

Compliance shall be determined by totaling the following products for each emissions unit:

- i. plastisol emissions

Multiply the maximum weight percent of solvent in the plastisol by the maximum production rate.

- ii. natural gas combustion

Multiply the AP-42 organic compound emission factor of 5.5 pounds of organic compound emissions per million cubic feet of natural gas fired by the maximum hourly amount of natural gas fired or use OAC rule 3745-21-10(C).

- b. Emission Limitation:

2.22 lbs/hr of Stoddard solvent (additive OC)

Applicable Compliance Method

Multiply the maximum weight percent of Stoddard solvent in the plastisol by the maximum production rate.

- c. Emission Limitation:

0.057 tpy of particulate emissions

## Applicable Compliance Method:

Multiply the AP-42 particulate emission factor of 7.6 pounds of particulate emissions per million cubic feet of natural gas fired by the maximum hourly amount of natural gas fired times 8760 hours and divide by 2000 lbs/ton.

**d.** Emission Limitation:

0.756 tpy of nitrogen oxides (NO<sub>x</sub>)

## Applicable Compliance Method:

Multiply the AP-42 nitrogen oxides emission factor of 100.0 pounds of nitrogen oxides emissions per million cubic feet of natural gas fired by the maximum hourly amount of natural gas fired times 8760 hours and divide by 2000 lbs/ton.

**e.** Emission Limitation:

0.635 tpy of carbon monoxide (CO)

Applicable Compliance Method:

Multiply the AP-42 carbon monoxide emission factor of 84.0 pounds of carbon monoxide emissions per million cubic feet of natural gas fired by the maximum hourly amount of natural gas fired times 8760 hours and divide by 2000 lbs/ton.

**f.** Emission Limitation:

0.005 tpy of sulfur dioxide (SO<sub>2</sub>)

Applicable Compliance Method:

Multiply the AP-42 sulfur dioxide emission factor of 0.6 pound of sulfur dioxide emissions per million cubic feet of natural gas fired by the maximum hourly amount of natural gas fired times 8760 hours and divide by 2000 lbs/ton.

**g.** Emission Limitation:

11.25 tons of OC per rolling, 12-month period for P004 through P010

Applicable Compliance Method:

Compliance shall be determined by totaling the following:

**i.** plastisol emissions

Monthly record keeping of the solvent and additive OC volatiles usage for P004, P005, P006, P007, P008, P009, and P010 as required in C.2 and C.3.

**ii.** natural gas combustion

Multiply the AP-42 organic compound emission factor of 5.5 pounds of organic compound emissions per million cubic feet of natural gas fired by the maximum yearly amount of natural gas fired and divided by 2000 lbs/ton.

**F. Miscellaneous Requirements**

1. This permit to install shall supersede all the air pollution control requirements for these emissions units previously contained in permit to install number 16-1709, as issued on March 10, 1999.
2. In accordance with OAC rule 3745-31-05(D), sections II.A.1, II.B.2, II.B.3, II.C.1, II.C.2, II.C.3, II.D.1, and II.D.2 of these terms and conditions constitute the federally enforceable portions of this permit.

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]****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>
Plastisol dip molding with natural gas oven - unit #7 with a capacity of 370 lbs/hr	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with requirements of OAC rule 3745-21-07(G)(2) and 3745-31-05(D).
		20.73 lbs/hr of organic compounds (OC);
		2.22 lbs/hr of Stoddard solvent*
		*The Stoddard solvent is included in the allowable mass emissions for OC.
		0.052 tpy of particulate emissions
		0.688 tpy of nitrogen oxides (NOx)
		0.578 tpy of carbon monoxide (CO)
		0.004 tpy of sulfur dioxide (SO <sub>2</sub> )
	OAC rule 3745-31-05(D)	11.25 tons of OC per rolling, 12-month period for P004 through P010
	OAC rule 3745-21-07(G)(2)	Exempt from the requirements of this rule pursuant to term B.1 below.

## 2. Additional Terms and Conditions

2.a None

## B. Operational Restrictions

1. The permittee shall only employ materials in this emissions unit which meet the following criteria either pursuant to OAC rule 3745-21-07(G)(9)(c) or pursuant to OAC rule 3745-21-07(G)(9)(d):

OAC rule 3745-21-07(G)(9)(c):

- a. the volatile content of such material consists only of water and liquid organic material; and
- b. the liquid organic material comprises not more than twenty percent of said volatile content; and
- c. the volatile content is not a photochemically reactive material.

OAC rule 3745-21-07(G)(9)(d):

- d. the volatile content of such material does not exceed twenty percent by volume of said material; and
  - e. the volatile content is not a photochemically reactive material.
2. The maximum annual solvent usage for P004, P005, P006, P007, P008, P009 and P010 shall not exceed 18,000 pounds per year, based upon a rolling, 12-month summation of the solvent usage figures.

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

Month(s)	Maximum Allowable Cumulative Solvent Usage
1	1500 pounds

1-2	3000 pounds
1-3	4500 pounds
1-4	6000 pounds
1-5	7500 pounds
1-6	9000 pounds
1-7	10,500 pounds
1-8	12,000 pounds
1-9	13,500 pounds
1-10	15,000 pounds
1-11	16,500 pounds
1-12	18,000 pounds

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual solvent usage limitation shall be based upon a rolling, 12-month summation of the solvent usage figures.

- The additive organic compound (OC) volatiles from P004, P005, P006, P007, P008, P009, and P010 shall not exceed 4104 pounds per year, based upon a rolling, 12-month summation of the monthly additive OC volatiles usage.

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

Month(s)	Maximum Allowable Cumulative Additive OC volatiles Usage
1	342 pounds
1-2	684 pounds
1-3	1026 pounds
1-4	1368 pounds
1-5	1710 pounds
1-6	2052 pounds
1-7	2394 pounds
1-8	2736 pounds
1-9	3078 pounds
1-10	3420 pounds
1-11	3762 pounds
1-12	4104 pounds

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual additive OC volatiles limitation shall be based upon a rolling, 12-month summation of the monthly amount of additive OC volatiles usage figures.

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

1. The permittee shall maintain records which document that each material employed in this emissions unit meets the criteria specified in B.1 above.
2. The permittee shall maintain monthly records of the following information:
  - a. the solvent usage, in pounds;
  - b. the additive OC volatiles usage, in pounds; and

- c. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the solvent usage figures and the additive OC volatiles usage figures.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative solvent usage and the cumulative additive OC volatiles usage for each calendar month.

- d. the Stoddard solvent weight percent in the plastisol.
  - e. the plastisol production rate.
3. The permit to install for this emissions unit (P007) 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 Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Stoddard solvent (additive OC)

TLV (mg/m<sup>3</sup>): 572

Maximum Hourly Emission Rate (lbs/hr): 2.22

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 495.6

MAGLC (ug/m<sup>3</sup>): 13,628

4. 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:

Emissions Unit ID: **P007**

- 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.).

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.

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

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify any material employed which does not meet the criteria in B.1 above. The report shall be submitted within 45 days of the occurrence.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month usage limitations for solvent and additive OC volatiles and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the

maximum allowable cumulative usage levels. These reports are by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

## E. Testing Requirements

1. Compliance with the emission limitations in A.1 above shall be determined in accordance with the following methods:

- a. Emission Limitation:

20.73 lbs/hr of organic compounds (OC)

Applicable Compliance Method:

Compliance shall be determined by totaling the following products for each emissions unit:

- i. plastisol emissions

Multiply the maximum weight percent of solvent in the plastisol by the maximum production rate.

- ii. natural gas combustion

Multiply the AP-42 organic compound emission factor of 5.5 pounds of organic compound emissions per million cubic feet of natural gas fired by the maximum hourly amount of natural gas fired or use OAC rule 3745-21-10(C).

- b. Emission Limitation:

2.22 lbs/hr of Stoddard solvent (additive OC)

Applicable Compliance Method

Multiply the maximum weight percent of Stoddard solvent in the plastisol by the maximum production rate.

- c. Emission Limitation:

0.052 tpy of particulate emissions

Applicable Compliance Method:

Multiply the AP-42 particulate emission factor of 7.6 pounds of particulate emissions per million cubic feet of natural gas fired by the maximum hourly amount of natural gas fired times 8760 hours and divide by 2000 lbs/ton.

d. Emission Limitation:

0.688 tpy of nitrogen oxides (NO<sub>x</sub>)

Applicable Compliance Method:

Multiply the AP-42 nitrogen oxides emission factor of 100.0 pounds of nitrogen oxides emissions per million cubic feet of natural gas fired by the maximum hourly amount of natural gas fired times 8760 hours and divide by 2000 lbs/ton.

**e.** Emission Limitation:

0.578 tpy of carbon monoxide (CO)

Applicable Compliance Method:

Multiply the AP-42 carbon monoxide emission factor of 84.0 pounds of carbon monoxide emissions per million cubic feet of natural gas fired by the maximum hourly amount of natural gas fired times 8760 hours and divide by 2000 lbs/ton.

**f.** Emission Limitation:

0.004 tpy of sulfur dioxide (SO<sub>2</sub>)

Applicable Compliance Method:

Multiply the AP-42 sulfur dioxide emission factor of 0.6 pound of sulfur dioxide emissions per million cubic feet of natural gas fired by the maximum hourly amount of natural gas fired times 8760 hours and divide by 2000 lbs/ton.

**g.** Emission Limitation:

11.25 tons of OC per rolling, 12-month period for P004 through P010

Applicable Compliance Method:

Compliance shall be determined by totaling the following:

**i.** plastisol emissions

Monthly record keeping of the solvent and additive OC volatiles usage for P004, P005, P006, P007, P008, P009, and P010 as required in C.2 and C.3.

**ii.** natural gas combustion

Multiply the AP-42 organic compound emission factor of 5.5 pounds of organic compound emissions per million cubic feet of natural gas fired by the maximum yearly amount of natural gas fired and divided by 2000 lbs/ton.

**F. Miscellaneous Requirements**

1. This permit to install shall supersede all the air pollution control requirements for these emissions units previously contained in permit to install number 16-1709, as issued on March 10, 1999.
2. In accordance with OAC rule 3745-31-05(D), sections II.A.1, II.B.2, II.B.3, II.C.1, II.C.2, II.C.3, II.D.1, and II.D.2 of these terms and conditions constitute the federally enforceable portions of this permit.

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]**

**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>
Plastisol dip molding with natural gas oven - unit #8 with a capacity of 350 lbs/hr	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with requirements of OAC rule 3745-21-07(G)(2) and 3745-31-05(D).
		19.61 lbs/hr of organic compounds (OC);
		2.1 lbs/hr of Stoddard solvent*
		*The Stoddard solvent is included in the allowable mass emissions for OC.
		0.052 tpy of particulate emissions
		0.688 tpy of nitrogen oxides (NOx)
		0.578 tpy of carbon monoxide (CO)
		0.004 tpy of sulfur dioxide (SO2)
	OAC rule 3745-31-05(D)	11.25 tons of OC per rolling, 12-month period for P004 through P010
	OAC rule 3745-21-07(G)(2)	Exempt from the requirements of this rule pursuant to term B.1 below.

**2. Additional Terms and Conditions**

**2.a** None

**B. Operational Restrictions**

**1.** The permittee shall only employ materials in this emissions unit which meet the following criteria either pursuant to OAC rule 3745-21-07(G)(9)(c) or pursuant to OAC rule 3745-21-07(G)(9)(d):

OAC rule 3745-21-07(G)(9)(c):

- a.** the volatile content of such material consists only of water and liquid organic material; and
- b.** the liquid organic material comprises not more than twenty percent of said volatile content; and
- c.** the volatile content is not a photochemically reactive material.

OAC rule 3745-21-07(G)(9)(d):

- d.** the volatile content of such material does not exceed twenty percent by volume of said material; and
- e.** the volatile content is not a photochemically reactive material.

**2.** The maximum annual solvent usage for P004, P005, P006, P007, P008, P009 and P010 shall not exceed 18,000 pounds per year, based upon a rolling, 12-month summation of the solvent usage figures.

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

Month(s)	Maximum Allowable Cumulative Solvent Usage
----------	---

1	1500 pounds
1-2	3000 pounds
1-3	4500 pounds
1-4	6000 pounds
1-5	7500 pounds
1-6	9000 pounds
1-7	10,500 pounds
1-8	12,000 pounds
1-9	13,500 pounds
1-10	15,000 pounds
1-11	16,500 pounds
1-12	18,000 pounds

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual solvent usage limitation shall be based upon a rolling, 12-month summation of the solvent usage figures.

- The additive organic compound (OC) volatiles from P004, P005, P006, P007, P008, P009, and P010 shall not exceed 4104 pounds per year, based upon a rolling, 12-month summation of the monthly additive OC volatiles usage.

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

Month(s)	Maximum Allowable Cumulative Additive OC volatiles Usage
1	342 pounds
1-2	684 pounds
1-3	1026 pounds
1-4	1368 pounds
1-5	1710 pounds
1-6	2052 pounds
1-7	2394 pounds
1-8	2736 pounds
1-9	3078 pounds
1-10	3420 pounds
1-11	3762 pounds

1-12

4104 pounds

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual additive OC volatiles limitation shall be based upon a rolling, 12-month summation of the monthly amount of additive OC volatiles usage figures.

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

1. The permittee shall maintain records which document that each material employed in this emissions unit meets the criteria specified in B.1 above.
2. The permittee shall maintain monthly records of the following information:
  - a. the solvent usage, in pounds;
  - b. the additive OC volatiles usage, in pounds; and

- c. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the solvent usage figures and the additive OC volatiles usage figures.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative solvent usage and the cumulative additive OC volatiles usage for each calendar month.

- d. the Stoddard solvent weight percent in the plastisol.
  - e. the plastisol production rate.
3. The permit to install for this emissions unit (P008) 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 Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Stoddard solvent (additive OC)

TLV (mg/m<sup>3</sup>): 572

Maximum Hourly Emission Rate (lbs/hr): 2.1

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 832.4

MAGLC (ug/m<sup>3</sup>): 13,628

4. 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 still 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:

Emissions Unit ID: **P008**

- 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.).

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.

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

#### **D. Reporting Requirements**

- 1. The permittee shall submit deviation (excursion) reports which identify any material employed which does not meet the criteria in B.1 above. The report shall be submitted within 45 days of the occurrence.
- 2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month usage limitations for solvent and additive OC volatiles and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the

maximum allowable cumulative usage levels. These reports are by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

## E. Testing Requirements

1. Compliance with the emission limitations in A.1 above shall be determined in accordance with the following methods:

- a. Emission Limitation:

19.61 lbs/hr of organic compounds (OC)

Applicable Compliance Method:

Compliance shall be determined by totaling the following products for each emissions unit:

- i. plastisol emissions

Multiply the maximum weight percent of solvent in the plastisol by the maximum production rate.

- ii. natural gas combustion

Multiply the AP-42 organic compound emission factor of 5.5 pounds of organic compound emissions per million cubic feet of natural gas fired by the maximum hourly amount of natural gas fired or use OAC rule 3745-21-10(C).

- b. Emission Limitation:

2.1 lbs/hr of Stoddard solvent (additive OC)

Applicable Compliance Method

Multiply the maximum weight percent of Stoddard solvent in the plastisol by the maximum production rate.-

- c. Emission Limitation:

0.052 tpy of particulate emissions

## Applicable Compliance Method:

Multiply the AP-42 particulate emission factor of 7.6 pounds of particulate emissions per million cubic feet of natural gas fired by the maximum hourly amount of natural gas fired times 8760 hours and divide by 2000 lbs/ton.

**d.** Emission Limitation:

0.688 tpy of nitrogen oxides (NO<sub>x</sub>)

## Applicable Compliance Method:

Multiply the AP-42 nitrogen oxides emission factor of 100.0 pounds of nitrogen oxides emissions per million cubic feet of natural gas fired by the maximum hourly amount of natural gas fired times 8760 hours and divide by 2000 lbs/ton.

**e.** Emission Limitation:

0.578 tpy of carbon monoxide (CO)

Applicable Compliance Method:

Multiply the AP-42 carbon monoxide emission factor of 84.0 pounds of carbon monoxide emissions per million cubic feet of natural gas fired by the maximum hourly amount of natural gas fired times 8760 hours and divide by 2000 lbs/ton.

**f.** Emission Limitation:

0.004 tpy of sulfur dioxide (SO<sub>2</sub>)

Applicable Compliance Method:

Multiply the AP-42 sulfur dioxide emission factor of 0.6 pound of sulfur dioxide emissions per million cubic feet of natural gas fired by the maximum hourly amount of natural gas fired times 8760 hours and divide by 2000 lbs/ton.

**g.** Emission Limitation:

11.25 tons of OC per rolling, 12-month period for P004 through P010

Applicable Compliance Method:

Compliance shall be determined by totaling the following:

**i.** plastisol emissions

Monthly record keeping of the solvent and additive OC volatiles usage for P004, P005, P006, P007, P008, P009, and P010 as required in C.2 and C.3.

**ii.** natural gas combustion

Multiply the AP-42 organic compound emission factor of 5.5 pounds of organic compound emissions per million cubic feet of natural gas fired by the maximum yearly amount of natural gas fired and divided by 2000 lbs/ton.

**F. Miscellaneous Requirements**

1. This permit to install shall supersede all the air pollution control requirements for these emissions units previously contained in permit to install number 16-1709, as issued on March 10, 1999.
2. In accordance with OAC rule 3745-31-05(D), sections II.A.1, II.B.2, II.B.3, II.C.1, II.C.2, II.C.3, II.D.1, and II.D.2 of these terms and conditions constitute the federally enforceable portions of this permit.

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]****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>
Plastisol dip molding with natural gas oven - unit #9 with a capacity of 500 lbs/hr	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with requirements of OAC rule 3745-21-07(G)(2) and 3745-31-05(D).
		28.01 lbs/hr of organic compounds (OC);
		3.0 lbs/hr of Stoddard solvent*
		*The Stoddard solvent is included in the allowable mass emissions for OC.
		0.052 tpy of particulate emissions
		0.688 tpy of nitrogen oxides (NOx)
		0.578 tpy of carbon monoxide (CO)
		0.004 tpy of sulfur dioxide (SO <sub>2</sub> )
	OAC rule 3745-31-05(D)	11.25 tons of OC per rolling, 12-month period for P004 through P010
	OAC rule 3745-21-07(G)(2)	Exempt from the requirements of this rule pursuant to term B.1 below.

## 2. Additional Terms and Conditions

2.a None

## B. Operational Restrictions

1. The permittee shall only employ materials in this emissions unit which meet the following criteria either pursuant to OAC rule 3745-21-07(G)(9)(c) or pursuant to OAC rule 3745-21-07(G)(9)(d):

OAC rule 3745-21-07(G)(9)(c):

- a. the volatile content of such material consists only of water and liquid organic material; and
- b. the liquid organic material comprises not more than twenty percent of said volatile content; and
- c. the volatile content is not a photochemically reactive material.

OAC rule 3745-21-07(G)(9)(d):

- d. the volatile content of such material does not exceed twenty percent by volume of said material; and
  - e. the volatile content is not a photochemically reactive material.
2. The maximum annual solvent usage for P004, P005, P006, P007, P008, P009 and P010 shall not exceed 18,000 pounds per year, based upon a rolling, 12-month summation of the solvent usage figures.

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

Month(s)	Maximum Allowable Cumulative Solvent Usage
1	1500 pounds

1-2	3000 pounds
1-3	4500 pounds
1-4	6000 pounds
1-5	7500 pounds
1-6	9000 pounds
1-7	10,500 pounds
1-8	12,000 pounds
1-9	13,500 pounds
1-10	15,000 pounds
1-11	16,500 pounds
1-12	18,000 pounds

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual solvent usage limitation shall be based upon a rolling, 12-month summation of the solvent usage figures.

- The additive organic compound (OC) volatiles from P004, P005, P006, P007, P008, P009, and P010 shall not exceed 4104 pounds per year, based upon a rolling, 12-month summation of the monthly additive OC volatiles usage.

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

Month(s)	Maximum Allowable Cumulative Additive OC volatiles Usage
1	342 pounds
1-2	684 pounds
1-3	1026 pounds
1-4	1368 pounds
1-5	1710 pounds
1-6	2052 pounds
1-7	2394 pounds
1-8	2736 pounds
1-9	3078 pounds
1-10	3420 pounds
1-11	3762 pounds
1-12	4104 pounds

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual additive OC volatiles limitation shall be based upon a rolling, 12-month summation of the monthly amount of additive OC volatiles usage figures.

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

1. The permittee shall maintain records which document that each material employed in this emissions unit meets the criteria specified in B.1 above.
2. The permittee shall maintain monthly records of the following information:
  - a. the solvent usage, in pounds;
  - b. the additive OC volatiles usage, in pounds; and
  - c. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the solvent usage figures and the additive OC volatiles usage figures.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative solvent usage and the cumulative additive OC volatiles usage for each calendar month.

- d. the Stoddard solvent weight percent in the plastisol.
  - e. the plastisol production rate.
3. The permit to install for this emissions unit (P009) 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 Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Stoddard solvent (additive OC)

TLV (mg/m3): 572

Maximum Hourly Emission Rate (lbs/hr): 3.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1111

MAGLC (ug/m3): 13,628

4. 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 still 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 (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.).

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.

5. 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 Toxics Policy:"

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

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify any material employed which does not meet the criteria in B.1 above. The report shall be submitted within 45 days of the occurrence.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month usage limitations for solvent and additive OC volatiles and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative usage levels. These reports are by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

#### **E. Testing Requirements**

1. Compliance with the emission limitations in A.1 above shall be determined in accordance with the following methods:

- a. Emission Limitation:

28.01 lbs/hr of organic compounds (OC)

Applicable Compliance Method:

Compliance shall be determined by totaling the following products for each emissions unit:

- i. plastisol emissions

Multiply the maximum weight percent of solvent in the plastisol by the maximum production rate.

- ii. natural gas combustion

Multiply the AP-42 organic compound emission factor of 5.5 pounds of organic compound emissions per million cubic feet of natural gas fired by the maximum hourly amount of natural gas fired or use OAC rule 3745-21-10(C).

**b.** Emission Limitation:

3.0 lbs/hr of Stoddard solvent (additive OC)

Applicable Compliance Method

Multiply the maximum weight percent of Stoddard solvent in the plastisol by the maximum production rate.-

**c.** Emission Limitation:

0.052 tpy of particulate emissions

Applicable Compliance Method:

Multiply the AP-42 particulate emission factor of 7.6 pounds of particulate emissions per million cubic feet of natural gas fired by the maximum hourly amount of natural gas fired times 8760 hours and divide by 2000 lbs/ton.

**d.** Emission Limitation:

0.688 tpy of nitrogen oxides (NOx)

Applicable Compliance Method:

Multiply the AP-42 nitrogen oxides emission factor of 100.0 pounds of nitrogen oxides emissions per million cubic feet of natural gas fired by the maximum hourly amount of natural gas fired times 8760 hours and divide by 2000 lbs/ton.

- e. Emission Limitation:
- 0.578 tpy of carbon monoxide (CO)
- Applicable Compliance Method:
- Multiply the AP-42 carbon monoxide emission factor of 84.0 pounds of carbon monoxide emissions per million cubic feet of natural gas fired by the maximum hourly amount of natural gas fired times 8760 hours and divide by 2000 lbs/ton.
- f. Emission Limitation:
- 0.004 tpy of sulfur dioxide (SO<sub>2</sub>)
- Applicable Compliance Method:
- Multiply the AP-42 sulfur dioxide emission factor of 0.6 pound of sulfur dioxide emissions per million cubic feet of natural gas fired by the maximum hourly amount of natural gas fired times 8760 hours and divide by 2000 lbs/ton.
- g. Emission Limitation:
- 11.25 tons of OC per rolling, 12-month period for P004 through P010
- Applicable Compliance Method:
- Compliance shall be determined by totaling the following:
- i. plastisol emissions
- Monthly record keeping of the solvent and additive OC volatiles usage for P004, P005, P006, P007, P008, P009, and P010 as required in C.2 and C.3.
- ii. natural gas combustion
- Multiply the AP-42 organic compound emission factor of 5.5 pounds of organic compound emissions per million cubic feet of natural gas fired by the maximum yearly amount of natural gas fired and divided by 2000 lbs/ton.

## F. Miscellaneous Requirements

1. This permit to install shall supersede all the air pollution control requirements for these emissions units previously contained in permit to install number 16-1709, as issued on March 10, 1999.
2. In accordance with OAC rule 3745-31-05(D), sections II.A.1, II.B.2, II.B.3, II.C.1, II.C.2, II.C.3, II.D.1, and II.D.2 of these terms and conditions constitute the federally enforceable portions of this permit.

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]****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>
Plastisol dip molding with natural gas oven - unit #10 with a capacity of 450 lbs/hr	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with requirements of OAC rule 3745-21-07(G)(2) and 3745-31-05(D).
		25.21 lbs/hr of organic compounds (OC);
		2.7 lbs/hr of Stoddard solvent*
		*The Stoddard solvent is included in the allowable mass emissions for OC.
		0.052 tpy of particulate emissions
		0.688 tpy of nitrogen oxides (NOx)
		0.578 tpy of carbon monoxide (CO)
		0.004 tpy of sulfur dioxide (SO <sub>2</sub> )
	OAC rule 3745-31-05(D)	11.25 tons of OC per rolling, 12-month period for P004 through P010
	OAC rule 3745-21-07(G)(2)	Exempt from the requirements of this rule pursuant to term B.1 below.

**2. Additional Terms and Conditions**

**2.a** None

**B. Operational Restrictions**

**1.** The permittee shall only employ materials in this emissions unit which meet the following criteria either pursuant to OAC rule 3745-21-07(G)(9)(c) or pursuant to OAC rule 3745-21-07(G)(9)(d):

OAC rule 3745-21-07(G)(9)(c):

- a.** the volatile content of such material consists only of water and liquid organic material; and
- b.** the liquid organic material comprises not more than twenty percent of said volatile content; and
- c.** the volatile content is not a photochemically reactive material.

OAC rule 3745-21-07(G)(9)(d):

- d.** the volatile content of such material does not exceed twenty percent by volume of said material; and
- e.** the volatile content is not a photochemically reactive material.

**2.** The maximum annual solvent usage for P004, P005, P006, P007, P008, P009 and P010 shall not exceed 18,000 pounds per year, based upon a rolling, 12-month summation of the solvent usage figures.

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

Month(s)	Maximum Allowable Cumulative Solvent Usage
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1	1500 pounds
1-2	3000 pounds
1-3	4500 pounds
1-4	6000 pounds
1-5	7500 pounds
1-6	9000 pounds
1-7	10,500 pounds
1-8	12,000 pounds
1-9	13,500 pounds
1-10	15,000 pounds
1-11	16,500 pounds
1-12	18,000 pounds

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual solvent usage limitation shall be based upon a rolling, 12-month summation of the solvent usage figures.

- The additive organic compound (OC) volatiles from P004, P005, P006, P007, P008, P009, and P010 shall not exceed 4104 pounds per year, based upon a rolling, 12-month summation of the monthly additive OC volatiles usage.

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

Month(s)	Maximum Allowable Cumulative Additive OC volatiles Usage
1	342 pounds
1-2	684 pounds
1-3	1026 pounds
1-4	1368 pounds
1-5	1710 pounds
1-6	2052 pounds
1-7	2394 pounds
1-8	2736 pounds
1-9	3078 pounds
1-10	3420 pounds
1-11	3762 pounds

1-12

4104 pounds

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual additive OC volatiles limitation shall be based upon a rolling, 12-month summation of the monthly amount of additive OC volatiles usage figures.

### C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain records which document that each material employed in this emissions unit meets the criteria specified in B.1 above.
2. The permittee shall maintain monthly records of the following information:
  - a. the solvent usage, in pounds;
  - b. the additive OC volatiles usage, in pounds; and
  - c. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the solvent usage figures and the additive OC volatiles usage figures.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative solvent usage and the cumulative additive OC volatiles usage for each calendar month.

- d. the Stoddard solvent weight percent in the plastisol.
  - e. the plastisol production rate.
3. The permit to install for this emissions unit (P010) 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 Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Stoddard solvent (additive OC)

TLV (mg/m3): 572

Maximum Hourly Emission Rate (lbs/hr): 2.7

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 398.1

MAGLC (ug/m3): 13,628

4. 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 still 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 (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.).

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.

5. 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 Toxics Policy:"

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

#### D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify any material employed which does not meet the criteria in B.1 above. The report shall be submitted within 45 days of the occurrence.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month usage limitations for solvent and additive OC volatiles and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative usage levels. These reports are by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

#### E. Testing Requirements

1. Compliance with the emission limitations in A.1 above shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
  
25.21 lbs/hr of organic compounds (OC)  
  
Applicable Compliance Method:  
  
Compliance shall be determined by totaling the following products for each emissions unit:
    - i. plastisol emissions  
  
Multiply the maximum weight percent of solvent in the plastisol by the maximum production rate.
    - ii. natural gas combustion

Multiply the AP-42 organic compound emission factor of 5.5 pounds of organic compound emissions per million cubic feet of natural gas fired by the maximum hourly amount of natural gas fired or use OAC rule 3745-21-10(C).

**b.** Emission Limitation:

2.7 lbs/hr of Stoddard solvent (additive OC)

Applicable Compliance Method

Multiply the maximum weight percent of Stoddard solvent in the plastisol by the maximum production rate.

**c.** Emission Limitation:

0.052 tpy of particulate emissions

Applicable Compliance Method:

Multiply the AP-42 particulate emission factor of 7.6 pounds of particulate emissions per million cubic feet of natural gas fired by the maximum hourly amount of natural gas fired times 8760 hours and divide by 2000 lbs/ton.

**d.** Emission Limitation:

0.688 tpy of nitrogen oxides (NOx)

Applicable Compliance Method:

Multiply the AP-42 nitrogen oxides emission factor of 100.0 pounds of nitrogen oxides emissions per million cubic feet of natural gas fired by the maximum hourly amount of natural gas fired times 8760 hours and divide by 2000 lbs/ton.

- e. Emission Limitation:
- 0.578 tpy of carbon monoxide (CO)
- Applicable Compliance Method:
- Multiply the AP-42 carbon monoxide emission factor of 84.0 pounds of carbon monoxide emissions per million cubic feet of natural gas fired by the maximum hourly amount of natural gas fired times 8760 hours and divide by 2000 lbs/ton.
- f. Emission Limitation:
- 0.004 tpy of sulfur dioxide (SO<sub>2</sub>)
- Applicable Compliance Method:
- Multiply the AP-42 sulfur dioxide emission factor of 0.6 pound of sulfur dioxide emissions per million cubic feet of natural gas fired by the maximum hourly amount of natural gas fired times 8760 hours and divide by 2000 lbs/ton.
- g. Emission Limitation:
- 11.25 tons of OC per rolling, 12-month period for P004 through P010
- Applicable Compliance Method:
- Compliance shall be determined by totaling the following:
- i. plastisol emissions
- Monthly record keeping of the solvent and additive OC volatiles usage for P004, P005, P006, P007, P008, P009, and P010 as required in C.2 and C.3.
- ii. natural gas combustion
- Multiply the AP-42 organic compound emission factor of 5.5 pounds of organic compound emissions per million cubic feet of natural gas fired by the maximum yearly amount of natural gas fired and divided by 2000 lbs/ton.

## F. Miscellaneous Requirements

1. This permit to install shall supersede all the air pollution control requirements for these emissions units previously contained in permit to install number 16-1709, as issued on March 10, 1999.
2. In accordance with OAC rule 3745-31-05(D), sections II.A.1, II.B.2, II.B.3, II.C.1, II.C.2, II.C.3, II.D.1, and II.D.2 of these terms and conditions constitute the federally enforceable portions of this permit.