

## ADDITIONAL SPECIAL TERMS & CONDITIONS

### A. Additional Terms and Conditions

1. The 2.27 lbs OC/hr and 4.86 lbs OC/hr limits were established to reflect the potential to emit for these emissions units. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limits.

### B. Operational Restrictions

1. The maximum OC contents and coating usage rates for each emissions unit K001 and K002 shall not exceed:

<u>Material Identification</u>	<u>OC Content</u>	<u>gal/month</u>	<u>gal/year</u>
Resin (Styrene - HAP)	4.0	33.3	400
Catalyst (MEKP)	9.3	0.33	4.0
Cleanup (acetone)	6.6	5	60

2. The maximum OC contents and coating usage rates for emissions unit K003 shall not exceed:

<u>Material Identification</u>	<u>OC Content</u>	<u>gal/month</u>	<u>gal/year</u>
Resin (Styrene - HAP)	4.0	600	7200
Catalyst (MEKP)	9.3	6.0	72
Cleanup (acetone)	6.6	10	120

### C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each month for each resin, catalyst, and cleanup material employed in each emissions units K001, K002, and K003:
  - a. The company identification for each material employed.
  - b. The number of gallons of each material employed.
  - c. The organic compound content of each material, in pounds per gallon.
  - d. The total organic compound emissions, in pounds per month(see calculation methodology in section E.1.b).
  - e. The total number of days the emissions units were in operation.
  - f. The average daily OC emission rates for all materials employed, i.e. (d)/(e), for each emissions unit.
  - g. The average daily usage rate for each material employed, in gallons per day, i.e. (b)/(e), for each emissions unit.
2. 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 the permit. Such records may be maintained in computerized form.

#### D. Reporting Requirements

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

For Emissions Units K001 and K002:

- a. An identification of each day during which the organic compound emissions from the resin, catalyst, and cleanup materials exceeded 18.37 pounds per day, and the actual organic compound emission rate for each such day.
- b. An identification of each month during which the monthly resin, catalyst, and cleanup usage rates exceeded the limits specified above, and the actual resin, catalyst, and cleanup usage rates for each such month.

For Emissions Unit K003:

- c. An identification of each day during which the organic compound emissions from the resin, catalyst, and cleanup materials exceeded 38.74 pounds per day, and the actual organic compound emission rate for each such day.
  - d. An identification of each month during which the monthly resin, catalyst, and cleanup usage rates exceeded the limits specified above, and the actual resin, catalyst, and cleanup usage rates for each such month.
2. These quarterly deviation (excursion) reports shall be submitted in the following manner:
  - a. Reports of any required monitoring and/or record keeping 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 record keeping requirements specified in this permit, b. the probable cause of such deviations, and c. any corrective actions or preventative 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. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings for emissions units K001, K002, or K003. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
4. The permittee shall also submit annual reports which specify the total organic compound emissions from these

emissions units for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements and Compliance Method Determinations

1. Compliance with the emission limitation(s) in this permit shall be determined in accordance with the following method(s):

**For each Emissions Units K001 and K002:**

- a. Emission Limitation-  
2.27 lbs/hour organic compounds

Applicable Compliance Method-  
Compliance shall be determined from the following:

- (i) The maximum total organic compound usage rate from the resins, in gallons per hour, shall be multiplied by the maximum organic compound content in pounds per gallon. The product shall then be multiplied by a loss factor of 0.271, as specified in EPA document 600/R-97-018a, Evaluation of Pollution Prevention Techniques to Reduce Styrene Emissions from Open Molding Processes, Volume 1, March 1997.
- (ii) The maximum total organic compound usage rate from the catalyst MEKP, in gallons per hour, shall be multiplied by the maximum organic compound content in pounds per gallon.
- (iii) The maximum total organic compound usage rate from the cleanup, in gallons per hour, shall be multiplied by the maximum organic compound content in pounds per gallon.
- (iv) The maximum total hourly organic compound emission rate, including cleanup, shall then be the sum of the results from (i), (ii), and (iii).

- b. Emission Limitation-  
18.37 lbs/day organic compounds

Applicable Compliance Method-  
Compliance shall be determined from the following:

- (i) The total organic compound usage rate from the resins, in gallons per day, average, as required to be recorded in Section C.1., shall be

multiplied by the maximum organic compound content in pounds per gallon. The product shall then be multiplied by a loss factor of 0.271, as specified in EPA document 600/R-97-018a, Evaluation of Pollution Prevention Techniques to Reduce Styrene Emissions from Open Molding Processes, Volume 1, March 1997.

(ii) The total organic compound usage rate from the catalyst MEKP, in gallons per day, average, as required to be recorded in Section C.1., shall be multiplied by the maximum organic compound content in pounds per gallon.

(iii) The total organic compound usage rate from the cleanup, in gallons per day, average, as required to be recorded in Section C.1., shall be multiplied by the maximum organic compound content in pounds per gallon.

(iv) The total daily organic compound emission rate, including cleanup, shall then be the sum of the results from (i), (ii), and (iii).

c. Emission Limitation-  
0.44 TPY OC, including cleanup

Applicable Compliance Method-  
Compliance shall be the summation of the daily organic compound emission rates (pounds) including cleanup, as determined in Section E.1.b., for the calendar year, divided by 2,000 pounds per ton.

**For Emissions Unit K003:**

d. Emission Limitation-  
4.86 lbs/hour organic compounds

Applicable Compliance Method-  
Compliance shall be determined from the following:

(i) The maximum total organic compound usage rate from the resins, in gallons per hour, shall be multiplied by the maximum organic compound content in pounds per gallon. The product shall then be multiplied by a loss factor of 0.271, as specified in EPA document 600/R-97-018a, Evaluation of Pollution Prevention Techniques to Reduce Styrene Emissions from Open Molding Processes, Volume 1, March 1997.

- (ii) The maximum total organic compound usage rate from the catalyst MEKP, in gallons per hour, shall be multiplied by the maximum organic compound content in pounds per gallon.
- (iii) The maximum total organic compound usage rate from the cleanup, in gallons per hour, shall be multiplied by the maximum organic compound content in pounds per gallon.
- (iv) The maximum total hourly organic compound emission rate, including cleanup, shall then be the sum of the results from (i), (ii), and (iii).

e. Emission Limitation-  
38.74 lbs/day organic compounds

Applicable Compliance Method-  
Compliance shall be determined from the following:

- (i) The total organic compound usage rate from the resins, in gallons per day, average, as required to be recorded in Section C.1., shall be multiplied by the maximum organic compound content in pounds per gallon. The product shall then be multiplied by a loss factor of 0.271, as specified in EPA document 600/R-97-018a, Evaluation of Pollution Prevention Techniques to Reduce Styrene Emissions from Open Molding Processes, Volume 1, March 1997.
- (ii) The total organic compound usage rate from the catalyst MEKP, in gallons per day, average, as required to be recorded in Section C.1., shall be multiplied by the maximum organic compound content in pounds per gallon.
- (iii) The total organic compound usage rate from the cleanup, in gallons per day, average, as required to be recorded in Section C.1., shall be multiplied by the maximum organic compound content in pounds per gallon.
- (iv) The total daily organic compound emission rate, including cleanup, shall then be the sum of the results from (i), (ii), and (iii).

f. Emission Limitation-  
4.63 TPY OC, including cleanup

Applicable Compliance Method-  
Compliance shall be the summation of the daily organic compound emission rates (pounds) including cleanup, as determined in Section E.1.e., for the calendar year, divided by 2,000 pounds per ton.

2. Formulation data or USEPA Method 24 for coatings shall be used to determine the organic compound contents of the materials employed in this emissions unit.

#### F. Miscellaneous Requirements

1. This permit allows the use of the coatings and cleanup materials specified by the permittee in the PTI application for these emissions units. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the organic compound emission limitation(s) specified in this permit was (were) established in accordance with the Ohio EPA's Air Toxics Policy and is (are) based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's Air Toxics Policy was demonstrated for each pollutant based on the SCREEN 3.0 model and a comparison of the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Styrene

TLV (mg/m<sup>3</sup>): 213

Maximum Hourly Emission Rate (lbs/hr): 2.17

Predicted 1-hour Maximum Ground Level Concentration  
(ug/m<sup>3</sup>): 1195

MAGLC (ug/m<sup>3</sup>): 2130

As long as the application of the Air Toxics Policy continues to show compliance with the applicable MAGLC, the permittee may implement any of the following changes with prior notification to and approval from the appropriate Ohio EPA District Office or local air agency:

- a. Any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 specified in the above table;

- b. Any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height);
- c. Any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of VOC [OAC rule 3745-21-01(B)(6)]; and
- d. Any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any Hazardous Air Pollutants as defined in OAC rule 3745-77-01(V).

For any change to the emissions unit or its method of operation that would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a modification as defined in OAC rule 3745-31-01, the permittee shall obtain a permit to install prior to the change