

Facility ID: 0125041960 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0125041960 Emissions Unit ID: P001 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Polyurethane foam line w/mold release spray booth	OAC rule 3745-31-05(A)(3) (PTI 01-6478) OAC 3745-31-05(D) OAC 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 25.6 lbs OC/hr. See section C.3, below. OC emissions shall not exceed 61 tons OC per rolling, 12-month period. See sections B.1 and B.2, below. See section A.2.a, below.
1.6 MMBTU/hr gas-fired curing oven	OAC 3745-17-07(A)(1)(b) OAC rule 3745-17-11(B)(1)	None, see section A.2.c, below. None, see section A.2.d below.

2. Additional Terms and Conditions

- (a) To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G)(2), no photochemically reactive materials (i.e., as raw materials or cleanup materials) shall be employed in this emissions unit.

Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5). The short term limitation of 25.6 lbs OC/hr was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with this limit. This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because the emissions unit is not subject to the requirements of OAC rule 3745-17-11. The uncontrolled mass rate of particulate emissions (PE)* from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. "Process weight" is defined in OAC rule 3745-17-01(B)(14).

* The burning of natural gas is the only source of PE from this emissions unit.

B. Operational Restrictions

1. The permittee shall not exceed the following for BCT-1200 spray mold release (or equivalent):
 - a. the OC content shall not exceed 97% by weight; and
 - b. the maximum annual usage shall not exceed 120,953 pounds, based upon a rolling, 12-month summation.
2. The permittee shall not exceed the following for CT-1007 hand mold release (or equivalent):
 - a. the OC content shall not exceed 65% by weight; and
 - b. the maximum annual usage shall not exceed 7,257 pounds based upon a rolling, 12-month summation.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information during each day of operation for the polyurethane foam line:
 - a. the company identification for each mold release compound employed;

- b. documentation on the photochemical reactivity of the compound;
- c. the OC content of each mold release compound, in percent by weight;
 - d. the number of pounds of each mold release compound employed;
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly OC emission rate in lbs/hr based on hours of operation for the emissions unit during each day.
2. The permittee shall maintain monthly records of the following information for application of mold release compounds in the spray booth:
- a. the usage of BCT-1200 (or equivalent) spray mold release, in pounds;
 - b. the usage of CT-1007 (or equivalent) hand mold release, in pounds; and
 - c. a rolling 12-month summation for each mold release, in pounds, as determined at the end of each month.
3. The permit to install for this emissions unit P001 was evaluated based on the actual materials (typically coatings) 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 2C model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 2C 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
 TLV (mg/m3): 525
 Maximum Hourly Emission Rate (lbs/hr): 24.4
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 990
 MAGLC (ug/m3): 12,500
- 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 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.
- The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
- D. Reporting Requirements**
1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedences of the following:
 - a. the rolling, 12-month limitation for OC emissions;
 - b. the OC content restriction on the mold release BCT-1200 (or equivalent) and the mold release CT-1007 (or equivalent) compounds; and
 - c. each day during which photochemically reactive compounds were employed in this emissions unit
 2. The permittee shall also submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
- E. Testing Requirements**
1. Emission Limitations:
 OC emisissions shall not exceed 25.6 lbs/hr and 61 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the hourly limitation may be demonstrated based on recordkeeping in C.1 and the following calculation: $25 \text{ lbs BCT} * 0.97 \text{ (OC content)} = 24.25 \text{ lb OC/hr}$ plus $2 \text{ lbs CT} * 0.65 \text{ (OC content)} = 1.3 \text{ lbs OC/hr}$.

Compliance with the annual rate may be demonstrated based on recordkeeping in C.2 and the following calculation: $120,953 \text{ lbs BCT/yr} * 0.97 \text{ (OC content)} = 58.66 \text{ tonsOC /yr}$ plus $7,257 \text{ lbs CT/yr} * 0.65 \text{ (OC content)} = 2.36 \text{ tons/yr}$.

F. **Miscellaneous Requirements**

1. None