Facility ID: 0204010490 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: 0204010490 Emissions Unit ID: P004 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P004 is press no. 9, a 300 ton press with changeable molds.	OAC rule 3745-31-05(C) [PTI No. 02-22463]	Volatile organic compounds/hazardous air pollutants (VOC/HAP) emissions shall not exceed 55.50 pounds per month and 0.33 ton per year. See sections A.2.a, B.1 and B.2.

2. **Additional Terms and Conditions**

   (a) The permittee has voluntarily accepted the operational restrictions in sections B.1 and B.2.

B. **Operational Restrictions**

1. The permittee must uncover, unwrap or expose only one charge per mold cycle per compression/injection molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds per one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting.

2. The permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.

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

1. The permittee shall collect and record the following information each month for this emissions unit:

   a. the company identification for each mold compound employed;
   b. the number of pounds of each mold compound employed;
   c. the percent, by weight, of VOC/HAP in each mold compound employed; and
   d. the available VOC/HAP from each mold compound employed, calculated as (b x c) for each mold compound employed.

2. The permittee shall conduct daily inspections of this emissions unit and maintain a log of these inspections. The log shall include the compliance status of the work practice standard identified in section B.1 and shall include the following information:

   a. whether the emissions unit was in operation;
   b. whether the permittee uncovered, unwrapped or exposed more than one charge per mold cycle per compression/injection molding machine as specified in section B.1; and
   c. information on the duration and cause of each deviation and the corrective action taken.

3. The permit to install for this emissions unit (P004) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the

results of the modeling for the "worst case" pollutant(s):

Pollutant: styrene monomer
TLV (mg/m3): 85
Maximum Hourly Emission Rate (lbs/hr): 1.1 lbs/hour for P001-P016 combined
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1286
MAGLC (ug/m3): 2,028

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:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

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

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

D. **Reporting Requirements**

1. The permittee shall submit written quarterly deviation (excursion) reports. The quarterly reports shall include:

a. an identification of each month during which the monthly VOC/HAP emissions exceeded 55.50 pounds, and the actual monthly VOC/HAP emissions for each such month; and
b. an identification of any day the permittee uncovered, unwrapped or exposed more than one charge per mold cycle per compression/injection molding machine.

If no deviations occurred during any such calendar quarter, a report indicating no deviations shall be sent.

E. **Testing Requirements**

1. Compliance with the allowable emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitation:
VOC/HAP emissions shall not exceed 55.50 pounds per month.

Applicable Compliance Method:
Compliance shall be calculated as the summation of the monthly VOC/HAP emissions for all mold compounds employed. The emissions for each mold compound shall be calculated as follows:

lbs VOC/HAP per month = P x 2.0%

where:

P = available VOC/HAP, in pounds per month, as recorded in section C.1.d; and
2.0 % = an emission factor based upon AP-24, Table 4.4-2 "Emission Factors for Uncontrolled Polyester Resin Product Fabrication Processes" (02/07).
Emission Limitation:
VOC/HAP emissions shall not exceed 0.33 ton per year.

Applicable Compliance Method:
Compliance shall be demonstrated by the summation of the monthly emissions calculated in section E.1.a for the calendar year and then dividing 2000 lbs/ton.

F. **Miscellaneous Requirements**

1. None