



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

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

Mailing Address:

Lazarus Gov.
Center

Application No: 02-15733

DATE: 2/21/2002

Premix Inc
Louise Barton
PO Box 281 3365 East Center St
North Kingsville, OH 44068

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
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

NEDO



Permit To Install

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

FINAL PERMIT TO INSTALL 02-15733

Application Number: 02-15733
APS Premise Number: 0204000133
Permit Fee: **\$400**
Name of Facility: Premix Inc
Person to Contact: Louise Barton
Address: PO Box 281 3365 East Center St
North Kingsville, OH 44068

Location of proposed air contaminant source(s) [emissions unit(s)]:

3365 East Center St
North Kingsville, Ohio

Description of proposed emissions unit(s):

2 Waste Treatment Units.

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. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Record keeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. 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.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or record keeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written 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

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calendar quarters. See B.10 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, record keeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. 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, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. 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 request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. 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.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are

required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

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10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

11. 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.

12. 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.

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B. State Only Enforceable 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 Record keeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping of state-only enforceable 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 state-only required 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 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. 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.

4. 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.

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5. 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.

6. 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.

7. 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).

8. Construction Compliance Certification

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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.

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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.

C. 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>
OC	5.48

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Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

1. Within 120 days after promulgation of the National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production, 40 CFR 63, Subpart WWWW the permittee shall submit an Initial Notification Report which certifies whether or not the permittee is subject to the promulgated standard. If the permittee is subject to the final standard, the following information shall also be included in the Initial Notification Report:
 - a. The name and mailing address of the permittee;
 - b. The physical location of the source if it is different from the mailing address;
 - c. Identification of the relevant MACT standard and the permittee's compliance date;
 - d. A brief description of the nature, design, size, and method of operation of the source, including the operating design capacity and an identification of each emission point of each hazardous air pollutant; and
 - e. A statement of whether or not the permittee is a major source or an area source according to the promulgated MACT.
2. Within 60 days following completion of the required compliance demonstration activity specified in 40 CFR 63, Subpart WWWW the permittee shall submit a notification of compliance status that contains the following information:
 - a. The methods used to determine compliance;
 - b. The results of any performance tests, opacity or visible emission observations, continuous monitoring system (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted;
 - c. The methods that will be used for determining continuous compliance, including a description of monitoring and reporting requirements and test methods;
 - d. The type and quantity of hazardous air pollutants emitted by the source, reported in units and averaging times in accordance with the test methods specified in 40 CFR Part 63, Subpart WWWW;
 - e. An analysis demonstrating whether the affected source is a major source or an area source;
 - f. A description of the air pollution control equipment or method for each emission point, including each control device or method for each hazardous air pollutant and the control efficiency (percent) for each control device or method; and

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- g. A statement of whether or not the permittee has complied with the requirements of 40 CFR 63, Subpart WWWW.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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>
P103 - Waste Treatment Unit No. 1	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 2.74 tons/year. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(1). See Sections A.I.2.a. and A.I.2.b.
	OAC rule 3745-21-07(G)(1)	OC emissions shall not exceed 3 lbs/hr and 15 lbs/day.

2. **Additional Terms and Conditions**

- 2.a The OC emissions from this emissions unit consist of styrene, a hazardous air pollutant (HAP) as listed in or pursuant to section 112(b) of the Clean Air Act.
- 2.b The following equipment standard(s) or work practice(s) shall be employed to minimize the generation of styrene emissions from this emissions unit:
 - i. All containers that store HAP materials must be kept closed or covered except during the addition or removal of materials;
 - ii. Doors and any other openings, other than makeup air inflow vents and the exhaust gas egress, shall remain closed throughout the treatment and cooling periods.

II. Operational Restrictions

1. No more than 1,350 lbs/day of waste, containing OCs, shall be treated within this emissions unit.

III. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The company identification of each container, which will contain or does contain OC waste, that shall be treated within this emissions unit.
 - b. The tare weight of each container, that will be employed for waste storage, in pounds.
 - c. The appropriate EPA hazardous waste code as listed in 40 CFR Part 261, of each waste within each container.
 - d. The weight of each container with untreated waste, prior to treatment, in pounds.
 - e. The weight of untreated waste within each container, i. e. (d) - (b), in pounds.
 - f. The sum total weight of untreated waste, in pounds.
 - g. The weight of each container with treated waste, after treatment, in pounds.
 - h. The weight of treated waste within each container, i. e. (g) - (b), in pounds.
 - i. The sum total weight of treated waste, in pounds.
 - j. The total OC emissions, i. e. (i) - (f), in pounds per day.
 - k. The actual number of hours that the emissions unit was in operation.
 - l. The average hourly OC emission rate, i.e. (j) divided by (k), in pounds per hour (average).
2. Except as otherwise provided in this section, the permittee shall perform inspections of this emissions unit in accordance with the following frequencies:

Work practice: HAP storage containers must be kept closed or covered except during the addition or removal of materials.

Minimum inspection frequency: once per day

Work practice: Doors and any other openings, other than makeup air inflow vents and the exhaust gas egress, shall remain closed throughout the treatment and cooling periods.

Minimum inspection frequency: once per day
3. The purpose of the inspections is to ensure that equipment standard(s) or work practice(s) to

minimize styrene emissions are employed. The inspections shall be performed during representative, normal operating conditions.

4. The permittee may, upon receipt of written approval from the Ohio EPA Northeast District Office, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
5. The permittee shall maintain daily records of the following information:
 - a. The date and reason any required inspection was not performed; and
 - b. The dates the equipment standard(s) or work practice(s) were not implemented when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly OC emissions exceeded 3 pounds per hour, and the actual average hourly OC emissions for each such day;
 - b. An identification of each day during which the OC emissions exceeded 15 pounds per day, and the actual OC emissions for each such day;
 - c. An identification of each day during which more than 1,350 lbs/day of total untreated waste, containing OCs, was treated within this emissions unit, and the actual, treated waste weight, in pounds;
 - d. An identification of each day during which an inspection was not performed at the initially required frequency (as per Section A.III.2) or the approved adjusted frequency (as per Section A.III.4); and
 - e. An identification of each instance when an equipment standard(s) or work practice(s) was/were not implemented.
2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted to the Ohio EPA Northeast District Office by April 15 of each year.

V. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation: 3 lbs OC/hr

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in Section A.III.1.1. If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 18, 25 or 25A, as appropriate, or an equivalent alternate method as approved by Ohio EPA.

- b. Emission Limitation: 15 lbs OC/day

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in Section A.III.1.j. Compliance may be determined based upon the following equation(s):

$$E(OC) = [\text{summation of } (W_u)] - [\text{summation of } (W_t)].$$

where:

$E(OC)$ = OC emissions as styrene from the waste treatment operations, in pounds per day.

W_u = the weight of untreated waste in container "u", in accordance with the record keeping requirements specified in Section A.III.1.e., in pounds per day.

W_t = the weight of treated waste in container "t", in accordance with the record keeping requirements specified in Section A.III.1.h., in pounds per day.

- c. Emission Limitation: 2.74 TPY OC

Applicable Compliance Method: Compliance shall be based on the sum of the daily OC emission rates, as calculated as per Section A.V.1.b. of this permit for the calendar year, and shall be divided by 2,000 pounds/ton.

VI. Miscellaneous Requirements

None.

B. State Only Enforceable Section

I. 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>
P103 - Waste Treatment Unit No. 1		Compliance with the Air Toxic Policy as specified in Sections B.III.1. to B.III.4.

2. Additional Terms and Conditions

- 2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Record keeping Requirements

1. 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.
2. The permit to install for this emissions unit 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

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Emissions Unit ID: P103

permit to install application. 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 SCREEN3 model. The predicted 1-hour maximum ground-level concentration from the use of the dispersion models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

AIR TOXIC ANALYSIS					
Emission Unit(s) ID	Pollutant	Threshold Limit Value (TLV) ($\mu\text{g}/\text{m}^3$)	Maximum Hourly Emission Rate (lbs/hr)	Predicted 1 Hour Maximum Ground Level Concentration ($\mu\text{g}/\text{m}^3$)	Maximum Acceptable Ground Level Concentration (MAGLC), ($\mu\text{g}/\text{m}^3$)
P103	Styrene	85,000	3	72.59	2,024
P104	Styrene	85,000	3	72.59	2,024
P103 + P104	All Styrene	85,000		145.18	2,024

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. Changes in the composition of the materials used, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of 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.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, 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.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

None.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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>
P104 - Waste Treatment Unit No. 2	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 2.74 tons/year. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(1). See Sections A.I.2.a. and A.I.2.b.
	OAC rule 3745-21-07(G)(1)	OC emissions shall not exceed 3 lbs/hr and 15 lbs/day.

2. Additional Terms and Conditions

- 2.a The OC emissions from this emissions unit consist of styrene, a hazardous air pollutant (HAP) as listed in or pursuant to section 112(b) of the Clean Air Act.
- 2.b The following equipment standard(s) or work practice(s) shall be employed to minimize the generation of styrene emissions from this emissions unit:
 - i. All containers that store HAP materials must be kept closed or covered except during the addition or removal of materials;
 - ii. Doors and any other openings, other than makeup air inflow vents and the exhaust gas egress, shall remain closed throughout the treatment and cooling periods.

II. Operational Restrictions

1. No more than 1,350 lbs/day of waste, containing OCs, shall be treated within this emissions unit.

III. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The company identification of each container, which will contain or does contain OC waste, that shall be treated within this emissions unit.
 - b. The tare weight of each container, that will be employed for waste storage, in pounds.
 - c. The appropriate EPA hazardous waste code as listed in 40 CFR Part 261, of each waste within each container.
 - d. The weight of each container with untreated waste, prior to treatment, in pounds.
 - e. The weight of untreated waste within each container, i. e. (d) - (b), in pounds.
 - f. The sum total weight of untreated waste, in pounds.
 - g. The weight of each container with treated waste, after treatment, in pounds.
 - h. The weight of treated waste within each container, i. e. (g) - (b), in pounds.
 - i. The sum total weight of treated waste, in pounds.
 - j. The total OC emissions, i. e. (i) - (f), in pounds per day.
 - k. The actual number of hours that the emissions unit was in operation.
 - l. The average hourly OC emission rate, i.e. (j) divided by (k), in pounds per hour (average).
2. Except as otherwise provided in this section, the permittee shall perform inspections of this emissions unit in accordance with the following frequencies:

Work practice: HAP storage containers must be kept closed or covered except during the addition or removal of materials.

Minimum inspection frequency: once per day

Work practice: Doors and any other openings, other than makeup air inflow vents and the exhaust gas egress, shall remain closed throughout the treatment and cooling periods.

Minimum inspection frequency: once per day

3. The purpose of the inspections is to ensure that equipment standard(s) or work practice(s) to minimize styrene emissions are employed. The inspections shall be performed during representative, normal operating conditions.
4. The permittee may, upon receipt of written approval from the Ohio EPA Northeast District Office, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
5. The permittee shall maintain daily records of the following information:
 - a. The date and reason any required inspection was not performed; and
 - b. The dates the equipment standard(s) or work practice(s) were not implemented when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly OC emissions exceeded 3 pounds per hour, and the actual average hourly OC emissions for each such day;
 - b. An identification of each day during which the OC emissions exceeded 15 pounds per day, and the actual OC emissions for each such day;
 - c. An identification of each day during which more than 1,350 lbs/day of total untreated waste, containing OCs, was treated within this emissions unit, and the actual, treated waste weight, in pounds;
 - d. An identification of each day during which an inspection was not performed at the initially required frequency (as per Section A.III.2) or the approved adjusted frequency (as per Section A.III.4); and
 - e. An identification of each instance when an equipment standard(s) or work practice(s)

was/were not implemented.

2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted to the Ohio EPA Northeast District Office by April 15 of each year.

V. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation: 3 lbs OC/hr

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in Section A.III.1.1. If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 18, 25 or 25A, as appropriate, or an equivalent alternate method as approved by Ohio EPA.

- b. Emission Limitation: 15 lbs OC/day

Applicable Compliance Method: Compliance shall be demonstrated in accordance with the record keeping requirements specified in Section A.III.1.j. Compliance may be determined based upon the following equation(s):

$$E(OC) = [\text{summation of } (W_u)] - [\text{summation of } (W_t)].$$

where:

$E(OC)$ = OC emissions as styrene from the waste treatment operations, in pounds per day.

W_u = the weight of untreated waste in container "u", in accordance with the record keeping requirements specified in Section A.III.1.e., in pounds per day.

W_t = the weight of treated waste in container "t", in accordance with the record keeping requirements specified in Section A.III.1.h., in pounds per day.

- c. Emission Limitation: 2.74 TPY OC

Applicable Compliance Method: Compliance shall be based on the sum of the daily OC emission rates, as calculated as per Section A.V.1.b. of this permit for the calendar year, and shall be divided by 2,000 pounds/ton.

VI. Miscellaneous Requirements

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PTI A

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None.

B. State Only Enforceable Section

I. 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>
P104 - Waste Treatment Unit No. 2		Compliance with the Air Toxic Policy as specified in Sections B.III.1. to B.III.4.

2. Additional Terms and Conditions

- 2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Record keeping Requirements

1. 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.
2. The permit to install for this emissions unit 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. 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 SCREEN3 model. The predicted 1-hour maximum ground-level concentration from the use of the dispersion models was compared to the Maximum Acceptable

Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

AIR TOXIC ANALYSIS					
Emission Unit(s) ID	Pollutant	Threshold Limit Value (TLV) ($\mu\text{g}/\text{m}^3$)	Maximum Hourly Emission Rate (lbs/hr)	Predicted 1 Hour Maximum Ground Level Concentration ($\mu\text{g}/\text{m}^3$)	Maximum Acceptable Ground Level Concentration (MAGLC), ($\mu\text{g}/\text{m}^3$)
P103	Styrene	85,000	3	72.59	2,024
P104	Styrene	85,000	3	72.59	2,024
P103 + P104	All Styrene	85,000		145.18	2,024

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. Changes in the composition of the materials used, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of 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

Premix Inc**PTI Application: 02-15722****Issued****Facility ID: 0204000133**Emissions Unit ID: **P104**

- 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.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, 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.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

None.

NEW SOURCE REVIEW FORM B

PTI Number: 02-15733 Facility ID: 0204000133

FACILITY NAME Premix Inc

FACILITY DESCRIPTION Polyester resin/styrene mold compound CITY/TWP North Kingsville
mfg. & fiberglass reinforced plastic parts

SIC CODE 3089 SCC CODE 5-03-007-01 EMISSIONS UNIT ID P103

EMISSIONS UNIT DESCRIPTION Waste Treatment Unit No. 1

DATE INSTALLED Upon permit issuance

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment				
PM ₁₀	Unclassified				
Sulfur Dioxide	Attainment				
Organic Compounds	Attainment	0.62 lb/hr		3 lbs/hr	
Organic Compounds	Attainment	14.985 lbs/day	2.74	15 lbs/day	2.74
Nitrogen Oxides	Attainment				
Carbon Monoxide	Attainment				
Lead	Attainment				
Air Toxics: styrene	Unclassified	0.62 lb/hr		3 lbs/hr	
Air Toxics: styrene	Unclassified	14.985 lbs/day	2.74	15 lbs/day	2.74

APPLICABLE FEDERAL RULES:

NSPS? NO NESHAP? NO MACT? NO for this emissions unit. Yes, facility wide. PSD? NO OFFSET POLICY? NO

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination Allowable OC limits based on compliance with OAC rule 3745-21-07(G)(1). BAT work practice standards: (1) all containers that store HAP materials must be kept closed or covered except during addition or removal of mtl.; and (2) door & other openings, except makeup air inflow vents and exhaust gas egress, shall remain closed throughout the treatment & cooling periods.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes.

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ NA

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NOIDENTIFY THE AIR CONTAMINANTS: STYRENE; see Attachment 2a-c.

NEW SOURCE REVIEW FORM B

PTI Number: 02-15733

Facility ID: 0204000133

FACILITY NAME Premix Inc

FACILITY DESCRIPTION Polvester resin/stvrene mold compound CITY/TWP North Kingsville

Emissions Unit ID: **P104**

SIC CODE 3089

SCC CODE 5-03-007-01

EMISSIONS UNIT ID P104

EMISSIONS UNIT DESCRIPTION Waste Treatment Unit No. 2

DATE INSTALLED Upon permit issuance

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment				
PM ₁₀	Unclassified				
Sulfur Dioxide	Attainment				
Organic Compounds	Attainment	0.62 lb/hr		3 lbs/hr	
Organic Compounds	Attainment	14.985 lbs/day	2.74	15 lbs/day	2.74
Nitrogen Oxides	Attainment				
Carbon Monoxide	Attainment				
Lead	Attainment				
Air Toxics: styrene	Unclassified	0.62 lb/hr		3 lbs/hr	
Air Toxics: styrene	Unclassified	14.985 lbs/day	2.74	15 lbs/day	2.74

APPLICABLE FEDERAL RULES:

NSPS? **NO** NESHAP? NO MACT? NO for this emissions unit. Yes, facility wide. PSD? **NO** OFFSET POLICY? NO

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination Allowable OC limits based on compliance with OAC rule 3745-21-07(G)(1). BAT work practice standards: (1) all containers that store HAP materials must be kept closed or covered except during addition or removal of mtl.; and (2) door & other openings, except makeup air inflow vents and exhaust gas egress, shall remain closed throughout the treatment & cooling periods.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes.

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ NA

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: STYRENE; see Attachment 2a-c.