

Synthetic Minor Determination and/or  Netting Determination

Permit To Install 03-11424d

**A. Source Description**

Guardian Manufacturing Company, Inc. (0339030016) plans to modify emissions units P001, P002, P004, P005, P006 and P007 by increasing the allowable annual OC emission rate from each unit. The emissions units are not being physically modified-- the increases in the hourly emission rate reflect corrections in the method the company employs to calculate the emissions.

**B. Facility Emissions and Attainment Status**

Based on the company's acceptance of federally enforceable restrictions (for purposes of Title V avoidance) in a previous PTI (No. 03-8740, issued on December 28, 1995), the facility's potential to emit OC is currently 32.5 tons/year. The facility is also below the major source level of 250 tons/year for all other criteria pollutants. Huron County is currently designated as attainment for all criteria pollutants.

**C. Source Emissions**

| Emissions Unit No. | OC emissions prior to the modification (PTI No. 03-8740) |       | OC emissions after the modification (PTI No. 03-11424) |        |
|--------------------|----------------------------------------------------------|-------|--------------------------------------------------------|--------|
|                    | lbs/hr                                                   | tpy   | lbs/hr                                                 | tpy    |
| P001               | 9.2*                                                     | 17.5* | 22.5*                                                  | 98.6*  |
| P002               | 9.2*                                                     | 17.5* | 22.5*                                                  | 98.6*  |
| P004               | 9.2*                                                     | 17.5* | 22.5*                                                  | 98.6*  |
| P005               | 114.5                                                    | 14.4  | 114.5                                                  | 40.0   |
| P006               | 11.1                                                     | 17.5* | 7.5                                                    | 32.8   |
| P007               | 3.0                                                      | 0.60  | 3.0                                                    | 2.74   |
| total              |                                                          | 32.5  |                                                        | 174.14 |

\*from P001, P002 and P004 combined

PTI No. 03-11424 will result in a net increase in OC emissions from the facility of 141.64 tons/year.

**D. Conclusion**

Because this permit will have federally enforceable emission limitations and operational restrictions, the facility's potential to emit will remain below 250 tons OC/year. Therefore, this facility is not a major source in terms of PSD and this permit does not require a PSD review. The facility, however, is no longer a minor facility in terms of Title V applicability.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL MODIFICATION  
HURON COUNTY**

**CERTIFIED MAIL**

Street Address:

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

Mailing Address:  
Lazarus Gov.  
Center

**Application No: 03-11424**

**DATE: 7/10/2001**

Guardian Manufacturing Company Inc  
Gene Lamoreaux  
302 Conwell Avenue  
Willard, OH 44890

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit modification should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install modification may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install modification a fee of \$ 600 will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

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

CC: USEPA

NWDO

MI



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install

Issue Date: To be entered upon final issuance

**DRAFT MODIFICATION OF PERMIT TO INSTALL 03-11424**

Application Number: 03-11424  
APS Premise Number: 0339030016  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Guardian Manufacturing Company Inc  
Person to Contact: Gene Lamoreaux  
Address: 302 Conwell Avenue  
Willard, OH 44890

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

**302 Conwell Avenue  
Willard, Ohio**

Description of proposed emissions unit(s):

**2 large dip rings, 1 small dip ring, cure oven, form release dip tank and dry oven.**

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

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

**1. Monitoring and Related Recordkeeping 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 recordkeeping 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 recordkeeping 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 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, recordkeeping, 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

**Issued: To be entered upon final issuance**

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.

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

- 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

**Guardian Manufacturing Company Inc**

**Facility ID: 0339030016**

**PTI Application: 03-11424**

**Issued: To be entered upon final issuance**

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.

**Guardian Manufacturing Company Inc**

**Facility ID: 0339030016**

**PTI Application: 03-11424**

**Issued: To be entered upon final issuance**

**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 Recordkeeping Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping 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 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. 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. 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.

**5. 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

**Guardian Manufacturing Company Inc**

**Facility ID: 0339030016**

**PTI Application: 03-11424**

**Issued: To be entered upon final issuance**

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.

**6. 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.

**7. 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.

**8. 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).

Guardian Manufacturing Company Inc

Facility ID: 0339030016

PTI Application: 03-11424

Issued: To be entered upon final issuance

**9. 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.

**10. 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               | 174.14               |

12

**Guardian Manufacturing Company Inc**  
**PTI Application: 03-11424**  
**Issued: To be entered upon final issuance**

**Facility ID: 0339030016**

**Guardian Manufacturing Company Inc**

**PTI Application: 03-11424**

**Issued**

**Facility ID: 0339030016**

Emissions Unit ID: P001

**Part II - FACILITY SPECIFIC TERMS AND CONDITIONS**

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

**None**

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

**None**

Guard  
PTI A

Emissions Unit ID: P001

Issued: To be entered upon final issuance

**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>                                                     |
|--------------------------------------------------------------------------------------------------------------|--------------------------------------|--------------------------------------------------------------------------------------------------------------|
| P001 - large dip ring number 1 for butyl rubber gloves - modification to allow for an increase in production | OAC rule 3745-31-05(A)(3)            | 22.5 pounds organic compounds (OC)/hour, 98.6 tons OC/year combined from emissions units P001, P002 and P004 |
|                                                                                                              | OAC rule 3745-21-07(G)               | reduce OC emissions by at least 85 percent                                                                   |

**2. Additional Terms and Conditions**

- 2.a Emissions of OC from emissions units P001, P002 and P004 shall be controlled by a carbon adsorption solvent recovery system which has 100 percent capture efficiency and a minimum removal efficiency of 96 percent.
- 2.b The permittee shall employ a permanent total enclosure around emissions units P001, P002 and P004.

**II. Operational Restrictions**

- 1. The permittee shall maintain at least 200 fpm negative airflow into the permanent total enclosure for this emissions unit through all natural draft openings (NDO) (or a pressure drop of 0.007 inch of water) whenever the emissions unit is in operation.

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

- 1. The permittee shall operate and maintain a continuous temperature monitor and recorder which

**Issued: To be entered upon final issuance**

measures and records the temperature of the carbon bed after regeneration (including any cooling cycle(s)). Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modification deemed necessary by the permitted.

The permittee shall collect and record the following information for each day:

- a. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when any of the associated emissions units were in operation; and
  - b. all carbon bed regeneration cycles during which the temperature of the carbon bed after regeneration was either more than 10 percent above the maximum temperature for any regeneration cycle during the most recent performance test that demonstrated that the emissions units were in compliance or greater than the specified temperature that is equivalent to 10 percent above the maximum temperature for any regeneration cycle.
2. The permittee shall install, maintain and operate monitoring devices and recorders which simultaneously measure and record the pressure inside and outside the permanent total enclosures for emissions units P001, P002 and P004. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record and maintain the following information on a daily basis:

- a. the difference in pressure between the permanent total enclosure and the surrounding area(s); and
- b. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

**IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports for emissions units P001, P002 and P004 which identify all carbon bed regeneration cycles during which the temperature of the carbon bed after regeneration was either more than 10 percent above the maximum temperature for any regeneration cycle during the most recent performance test that demonstrated the emissions units were in compliance or greater than the specified temperature that is equivalent to 10 percent above the maximum temperature for any regeneration cycle. Refer to the General Terms and Conditions (Part I, section A.I.c.ii).

**Guardian Manufacturing Company Inc**

**PTI Application: 03-11424**

**Issued**

**Facility ID: 0339030016**

Emissions Unit ID: P001

2. The permittee shall submit quarterly summaries for emissions units P001, P002 and P004 which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions units were in operation.
3. The permittee shall submit pressure differential deviation (excursion) reports for emissions units P001, P002 and P004 that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified above. Refer to the General Terms and Conditions (Part I, section A.I.c.ii).

**Issued: To be entered upon final issuance**

## V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for the carbon adsorption solvent recovery system which controls the emissions from units P001, P002 and P004 in accordance with the following requirements:
  - a. the emissions testing shall be conducted every 2.5 years (beginning with the date of the most recent performance test);
  - b. the emissions testing shall be conducted to demonstrate compliance with the capture and control efficiency limitations;
  - c. the following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate for OC: the capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the U.S. EPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases; and
  - d. the test(s) shall be conducted while the emissions units are operating at or near the maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA district office or local air agency.
2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA district office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the appropriate Ohio EPA district office or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA district office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provided a valid characterization of the emissions from the emissions unit and/or the performance of the control

Emissions Unit ID: P001

requirement.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Northwest District Office within 30 days following completion of the test(s).

3. Compliance Methods Requirements: Compliance with the emission limitation(s) established in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

- a. Emission Limitation:

P001, P002 and P004 combined - 22.5 pounds OC/hour, 98.6 tons OC/year

Applicable Compliance Method:

The hourly and annual OC emission limitations are based on the potential to emit of each emissions unit multiplied by a minimum control efficiency of 96 percent. The permittee shall demonstrate compliance with this emission limitation by conducting the performance testing required in section A.V.1 and A.V.2.

## **VI. Miscellaneous Requirements**

None

**Guard  
PTI A**

Emissions Unit ID: P001

**Issued: To be entered upon final issuance**

**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> |
|--------------------------------------------------------------------------------------------------------------|--------------------------------------|----------------------------------------------------------|
| P001 - large dip ring number 1 for butyl rubber gloves - modification to allow for an increase in production | None                                 | see section B.III                                        |

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

1. The permit to install for emissions units P001, P002, P004, P006 and P007 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each 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 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: xylene (70% of emissions)  
 TLV (mg/m3): 434  
 Maximum Hourly Emission Rate (lbs/hr): 23.1

**Issued: To be entered upon final issuance**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,017

MAGLC: 10,333.3

Pollutant: toluene (28% of emissions)

TLV (mg/m3): 188.0

Maximum Hourly Emission Rate (lbs/hr): 9.24

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 806.6

MAGLC: 4,476.2

2. Physical changes to or changes in the method of operation of the emissions units after 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 (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.).
3. 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.
4. 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,

Emissions Unit ID: P001

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.

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

Issued: To be entered upon final issuance

**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>                                                                                                       |
|--------------------------------------------------------------------------------------------------------------|---------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|
| P002 - small dip ring number 3 for butyl rubber gloves - modification to allow for an increase in production | OAC rule 3745-31-05(A)(3)<br><br>OAC rule 3745-21-07(G) | 22.5 pounds organic compounds (OC)/hour, 98.6 tons OC/year combined from emissions units P001, P002 and P004<br><br>reduce OC emissions by at least 85 percent |

**2. Additional Terms and Conditions**

- 2.a Emissions of OC from emissions units P001, P002 and P004 shall be controlled by a carbon adsorption solvent recovery system which has 100 percent capture efficiency and a minimum removal efficiency of 96 percent.
- 2.b The permittee shall employ a permanent total enclosure around emissions units P001, P002 and P004.

**II. Operational Restrictions**

1. The permittee shall maintain at least 200 fpm negative airflow into the permanent total enclosure for this emissions unit through all natural draft openings (NDO) (or a pressure drop of 0.007 inch of water) whenever the emissions unit is in operation.

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

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which

Emissions Unit ID: P002

measures and records the temperature of the carbon bed after regeneration (including any cooling cycle(s)). Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modification deemed necessary by the permitted.

The permittee shall collect and record the following information for each day:

- a. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when any of the associated emissions units were in operation; and
  - b. all carbon bed regeneration cycles during which the temperature of the carbon bed after regeneration was either more than 10 percent above the maximum temperature for any regeneration cycle during the most recent performance test that demonstrated that the emissions units were in compliance or greater than the specified temperature that is equivalent to 10 percent above the maximum temperature for any regeneration cycle.
2. The permittee shall install, maintain and operate monitoring devices and recorders which simultaneously measure and record the pressure inside and outside the permanent total enclosures for emissions units P001, P002 and P004. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record and maintain the following information on a daily basis:

- a. the difference in pressure between the permanent total enclosure and the surrounding area(s); and
- b. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

#### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports for emissions units P001, P002 and P004 which identify all carbon bed regeneration cycles during which the temperature of the carbon bed after regeneration was either more than 10 percent above the maximum temperature for any regeneration cycle during the most recent performance test that demonstrated the emissions units were in compliance or greater than the specified temperature that is equivalent to 10 percent above the maximum temperature for any regeneration cycle. Refer to the General Terms and Conditions (Part I, section A.I.c.ii).
2. The permittee shall submit quarterly summaries for emissions units P001, P002 and P004 which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions units were in operation.
3. The permittee shall submit pressure differential deviation (excursion) reports for emissions units

**Guard**

**PTI A**

Emissions Unit ID: P002

**Issued: To be entered upon final issuance**

P001, P002 and P004 that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified above. Refer to the General Terms and Conditions (Part I, section A.I.c.ii).

**Issued: To be entered upon final issuance**

## V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for the carbon adsorption solvent recovery system which controls the emissions from units P001, P002 and P004 in accordance with the following requirements:
  - a. the emissions testing shall be conducted every 2.5 years (beginning with the date of the most recent performance test);
  - b. the emissions testing shall be conducted to demonstrate compliance with the capture and control efficiency limitations;
  - c. the following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate for OC: the capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the U.S. EPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases; and
  - d. the test(s) shall be conducted while the emissions units are operating at or near the maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA district office or local air agency.
2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA district office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the appropriate Ohio EPA district office or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA district office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provided a valid characterization of the emissions from the emissions unit and/or the performance of the control

requirement.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Northwest District Office within 30 days following completion of the test(s).

3. Compliance Methods Requirements: Compliance with the emission limitation(s) established in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

- a. Emission Limitation:

P001, P002 and P004 combined - 22.5 pounds OC/hour, 98.6 tons OC/year

Applicable Compliance Method:

The hourly and annual OC emission limitations are based on the potential to emit of each emissions unit multiplied by a minimum control efficiency of 96 percent. The permittee shall demonstrate compliance with this emission limitation by conducting the performance testing required in section A.V.1 and A.V.2.

## **VI. Miscellaneous Requirements**

None

Guard  
PTI A

Emissions Unit ID: P002

**Issued: To be entered upon final issuance**

**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> |
|--------------------------------------------------------------------------------------------------------------|--------------------------------------|----------------------------------------------------------|
| P002 - small dip ring number 3 for butyl rubber gloves - modification to allow for an increase in production | None                                 | see section B.III                                        |

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

1. The permit to install for emissions units P001, P002, P004, P006 and P007 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each 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 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: xylene (70% of emissions)  
 TLV (mg/m3): 434  
 Maximum Hourly Emission Rate (lbs/hr): 23.1

Emissions Unit ID: P002

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2017

MAGLC (ug/m3): 10,333.3

Pollutant: toluene (28% of emissions)

TLV (mg/m3): 188.0

Maximum Hourly Emission Rate (lbs/hr): 9.24

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 806.6

MAGLC (ug/m3): 4,476.2

2. Physical changes to or changes in the method of operation of the emissions units after 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 (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.).
3. 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.
4. 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

**Guard**

**PTI A**

Emissions Unit ID: P002

**Issued: To be entered upon final issuance**

- 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.

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

Issued: To be entered upon final issuance

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>                                                                                                       |
|--------------------------------------------------------------------------------------------------------------|---------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|
| P004 - large dip ring number 2 for butyl rubber gloves - modification to allow for an increase in production | OAC rule 3745-31-05(A)(3)<br><br>OAC rule 3745-21-07(G) | 22.5 pounds organic compounds (OC)/hour, 98.6 tons OC/year combined from emissions units P001, P002 and P004<br><br>reduce OC emissions by at least 85 percent |

2. Additional Terms and Conditions

- 2.a Emissions of OC from emissions units P001, P002 and P004 shall be controlled by a carbon adsorption solvent recovery system which has 100 percent capture efficiency and a minimum removal efficiency of 96 percent.
- 2.b The permittee shall employ a permanent total enclosure around emissions units P001, P002 and P004.

II. Operational Restrictions

- 1. The permittee shall maintain at least 200 fpm negative airflow into the permanent total enclosure for this emissions unit through all natural draft openings (NDO) (or a pressure drop of 0.007 inch of water) whenever the emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall operate and maintain a continuous temperature monitor and recorder which

Emissions Unit ID: P004

measures and records the temperature of the carbon bed after regeneration (including any cooling cycle(s)). Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modification deemed necessary by the permitted.

The permittee shall collect and record the following information for each day:

- a. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when any of the associated emissions units were in operation; and
  - b. all carbon bed regeneration cycles during which the temperature of the carbon bed after regeneration was either more than 10 percent above the maximum temperature for any regeneration cycle during the most recent performance test that demonstrated that the emissions units were in compliance or greater than the specified temperature that is equivalent to 10 percent above the maximum temperature for any regeneration cycle.
2. The permittee shall install, maintain and operate monitoring devices and recorders which simultaneously measure and record the pressure inside and outside the permanent total enclosures for emissions units P001, P002 and P004. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record and maintain the following information on a daily basis:

- a. the difference in pressure between the permanent total enclosure and the surrounding area(s); and
- b. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports for emissions units P001, P002 and P004 which identify all carbon bed regeneration cycles during which the temperature of the carbon bed after regeneration was either more than 10 percent above the maximum temperature for any regeneration cycle during the most recent performance test that demonstrated the emissions units were in compliance or greater than the specified temperature that is equivalent to 10 percent above the maximum temperature for any regeneration cycle. Refer to the General Terms and Conditions (Part I, section A.I.c.ii).
2. The permittee shall submit quarterly summaries for emissions units P001, P002 and P004 which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions units were in operation.
3. The permittee shall submit pressure differential deviation (excursion) reports for emissions units

**Guard**

**PTI A**

Emissions Unit ID: P004

**Issued: To be entered upon final issuance**

P001, P002 and P004 that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified above. Refer to the General Terms and Conditions (Part I, section A.I.c.ii).

**Issued: To be entered upon final issuance**

## V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for the carbon adsorption solvent recovery system which controls the emissions from units P001, P002 and P004 in accordance with the following requirements:
  - a. the emissions testing shall be conducted every 2.5 years (beginning with the date of the most recent performance test);
  - b. the emissions testing shall be conducted to demonstrate compliance with the capture and control efficiency limitations;
  - c. the following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate for OC: the capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the U.S. EPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases; and
  - d. the test(s) shall be conducted while the emissions units are operating at or near the maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA district office or local air agency.
2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA district office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the appropriate Ohio EPA district office or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA district office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provided a valid characterization of the emissions from the emissions unit and/or the performance of the control

requirement.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to Ohio EPA, Northwest District Office within 30 days following completion of the test(s).

3. Compliance Methods Requirements: Compliance with the emission limitation(s) established in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

- a. Emission Limitation:

P001, P002 and P004 combined - 22.5 pounds OC/hour, 98.6 tons OC/year

Applicable Compliance Method:

The hourly and annual OC emission limitations are based on the potential to emit of each emissions unit multiplied by a minimum control efficiency of 96 percent. The permittee shall demonstrate compliance with this emission limitation by conducting the performance testing required in section A.V.1 and A.V.2.

## **VI. Miscellaneous Requirements**

None

Guard  
PTI A

Emissions Unit ID: P004

Issued: To be entered upon final issuance

**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> |
|--------------------------------------------------------------------------------------------------------------|--------------------------------------|----------------------------------------------------------|
| P004 - large dip ring number 2 for butyl rubber gloves - modification to allow for an increase in production | None                                 | see section B.III                                        |

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

- 1. The permit to install for emissions units P001, P002, P004, P006 and P007 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each 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 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: xylene (70% of emissions)  
 TLV (mg/m3): 434  
 Maximum Hourly Emission Rate (lbs/hr): 23.1

Emissions Unit ID: P004

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2017

MAGLC (ug/m3): 10,333.3

Pollutant: toluene (28% of emissions)

TLV (mg/m3): 188.0

Maximum Hourly Emission Rate (lbs/hr): 9.24

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 806.6

MAGLC (ug/m3): 4,476.2

2. Physical changes to or changes in the method of operation of the emissions units after 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 (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.).
3. 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.
4. 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

**Issued: To be entered upon final issuance**

- 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.

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Issued: To be entered upon final issuance**

**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> |
|------------------------------------------------------------------------------------|--------------------------------------|----------------------------------------------------------|
| P005 - form release dip tank - modification to allow for an increase in production | OAC rule 3745-31-05(A)(3)            | 114.5 pounds OC/hour                                     |
|                                                                                    | OAC rule 3745-31-05(D)               | 40.0 tons OC/year                                        |
|                                                                                    | OAC rule 3745-21-07(G)               | see section A.II.1                                       |

**2. Additional Terms and Conditions**

- 2.a The permittee has requested the following federally enforceable emission restrictions for the purposes of establishing the company as a PSD minor facility:

The annual OC emissions from emissions unit P005 shall not exceed 40.0 tons/year, based on a rolling, 12-month summation of the daily input rates.

Emissions unit P005 is an existing emissions unit and, as such, has existing 12-month summation of the input rates in lieu of establishing monthly cumulative input rates for the first year of operation.

**II. Operational Restrictions**

1. The permittee shall not employ any coating and/or cleanup material in this emissions unit which is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).
2. The emissions of OC from emissions unit P005 shall not exceed 40.0 tons/year, based upon a rolling, 12-month summation of the monthly OC input rates.

**Guardian Manufacturing Company Inc**

**PTI Application: 03-11424**

**Issued**

**Facility ID: 0339030016**

Emissions Unit ID: P005

3. The maximum monthly ethanol usage rate for this emissions unit shall not exceed 1,013.2 gallons. This equates to 6,666.9 pounds ethanol/month based on a density of 6.58 pounds/gallon of ethanol.

Issued: To be entered upon final issuance

### III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each month for emissions unit P005:
  - a. the quantity of gloves produced at the facility;
  - b. the number of gloves/tray;
  - c. the number of trays coated/month [a/b]; and
  - d. alcohol usage (pounds/month) [c x 9.54 pounds alcohol/tray].

### IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month OC input rate limitation for emissions unit P005. Refer to the General Terms and Conditions (Part I, section A.I.c.ii).

### V. Testing Requirements

1. Compliance Methods Requirements: Compliance with the emission limitation(s) established in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):
  - a. Emission Limitation:  
  
114.5 pounds OC/hour  
  
Applicable Compliance Method:  
  
The hourly OC emission limitation is based on the emissions unit's potential to emit-- a maximum OC usage rate of 114.5 pounds/hour. Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this emissions limitation.
  - b. Emission Limitation:  
  
40.0 tons OC/rolling, 12-month period

41

**Guard**

**PTI A**

Emissions Unit ID: P005

**Issued: To be entered upon final issuance**

Applicable Compliance Method:

Compliance shall be determined in accordance with the recordkeeping required in section A.III.1.

**VI. Miscellaneous Requirements**

None

Guard  
PTI A

Emissions Unit ID: P005

Issued: To be entered upon final issuance

**B. State Only Enforceable Section**

**I. 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> |
|------------------------------------------------------------------------------------|--------------------------------------|----------------------------------------------------------|
| P005 - form release dip tank - modification to allow for an increase in production | None                                 | see section B.III                                        |

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

- The permit to install for 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. 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: ethanol

TLV (mg/m3): 1,880

Maximum Hourly Emission Rate (lbs/hr): 102.5 (increase only)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 11,210

MAGLC (ug/m3): 44,761.9

2. Physical changes to or changes in the method of operation of the emissions units after 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 (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.).
3. 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.
4. 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.

#### IV. Reporting Requirements

None

Guard  
PTI A

Emissions Unit ID: P006

Issued: To be entered upon final issuance

**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> |
|-----------------------------------------------------------------------|--------------------------------------|----------------------------------------------------------|
| P006 - dry oven - modification to allow for an increase in production | OAC rule 3745-31-05(A)(3)            | 7.5 pounds OC/hour, 32.8 tons OC/year                    |

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

None

**IV. Reporting Requirements**

None

**Guardian Manufacturing Company Inc**  
**PTI Application: 03-11424**  
**Issued**

**Facility ID: 0339030016**

Emissions Unit ID: P006

**V. Testing Requirements**

1. Compliance Methods Requirements: Compliance with the emission limitation(s) established in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

a. Emission Limitation:

7.5 pounds OC/hour, 32.8 tons OC/year

**Guard****PTI A**

Emissions Unit ID: P006

**Issued: To be entered upon final issuance**

Applicable Compliance Method:

The hourly OC emission limitation is based on the emissions unit's potential to emit-- the maximum OC input rate to the oven (40 pounds/hour) minus the OC remaining in the gloves after the oven (13 pounds/hour). This value is multiplied by the maximum number of loads/hour (0.278). Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this emission limitation.

The tons/year emission limitation was developed by multiplying the potential to emit (pounds/hour) by the maximum operating schedule of 8,760 hours/year and dividing by 2000 pounds/ton.

**VI. Miscellaneous Requirements**

None

Guard  
PTI A

Emissions Unit ID: P006

Issued: To be entered upon final issuance

**B. State Only Enforceable Section**

**I. 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> |
|-----------------------------------------------------------------------|--------------------------------------|----------------------------------------------------------|
| P006 - dry oven - modification to allow for an increase in production | None                                 | see section B.III                                        |

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

- The permit to install for emissions units P001, P002, P004, P006 and P007 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each 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 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: xylene (70% of emissions)

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 23.1

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2017

48

**Guard**

**PTI A**

**Issued: To be entered upon final issuance**

MAGLC (ug/m3): 10,333.3

Pollutant: toluene (28% of emissions)

TLV (mg/m3): 188.0

Emissions Unit ID: P006

**Issued: To be entered upon final issuance**

Maximum Hourly Emission Rate (lbs/hr): 9.24

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 806.6

MAGLC (ug/m3): 4,476.2

2. Physical changes to or changes in the method of operation of the emissions units after 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 (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.).
3. 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.
4. 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

Emissions Unit ID: P006

- 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.

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Issued: To be entered upon final issuance**

**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> |
|---------------------------------------------------------------------------------|--------------------------------------|----------------------------------------------------------|
| P007 - cure oven number 1 - modification to allow for an increase in production | OAC rule 3745-31-05(A)(3)            | 2.74 tons OC/year                                        |
|                                                                                 | OAC rule 3745-21-07(G)(1)            | 3.0 pounds OC/hour not to exceed 15.0 pounds OC/day      |

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

1. The permittee shall limit the quantity of gloves that may be cured each day in emissions unit P007 to less than or equal to 606 pounds of dry gloves.

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

1. The permittee shall collect and record the following information for each day for emissions unit P007:
  - a. the type of glove cured (e.g., 7 mil butyl, 14 mil butyl, 25 mil butyl, 35 mil butyl or 35 mil neoprene);
  - b. the number of trays of gloves cured/batch;
  - c. the number of pairs of gloves/tray;

**Issued: To be entered upon final issuance**

- d. the dry weight of each pair of gloves (pounds);
- e. the total dry weight of gloves cured/batch [b x c x d];
- f. the OC emissions/batch ("x") from the cure oven [e/525=x/13];\*
- g. the number of hours/batch cured; and
- h. the average hourly OC emissions/batch [f/g].

\* The permittee has provided test data which shows that the OC emissions from the cure oven when drying 525 pounds of 25 mil butyl gloves is 13 pounds/batch. The permittee has indicated that the OC emissions are directly proportional to the dry glove weight.

**IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. An identification of each hour during which the organic compound emissions exceeded 3 pounds per hour, and the actual organic compound emissions for each such hour.
  - b. An identification of each day during which the organic compound emissions exceeded 15 pounds per day, and the actual organic compound emissions for each such day.

Refer to the General Terms and Conditions (Part I, section A.I.c.ii).

**V. Testing Requirements**

1. Compliance Methods Requirements: Compliance with the emission limitation(s) established in section A.I of the terms and conditions of this permit shall be determined in accordance with the following method(s):

- a. Emission Limitation:

3.0 pounds OC/hour not to exceed 15.0 pounds OC/day

Applicable Compliance Method:

Compliance shall be determined in accordance with the record keeping required in section A.III.1.

**Guardian Manufacturing Company Inc**

**PTI Application: 03-11424**

**Issued**

**Facility ID: 0339030016**

Emissions Unit ID: P007

b. Emission Limitation:

2.74 tons OC/year

Applicable Compliance Method:

The tons/year emission limitation was developed by multiplying the potential to emit (pounds/day) by the maximum operating schedule of 365 days/year and dividing by 2000 pounds/ton.

54

**Guard**

**PTI A**

**Issued: To be entered upon final issuance**

Emissions Unit ID: P007

**VI. Miscellaneous Requirements**

None

**Issued: To be entered upon final issuance**

**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> |
|---------------------------------------------------------------------------------|--------------------------------------|----------------------------------------------------------|
| P007 - cure oven number 1 - modification to allow for an increase in production | None                                 | see section B.III                                        |

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

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

1. The permit to install for emissions units P001, P002, P004, P006 and P007 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each 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 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: xylene (70% of emissions)

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 23.1

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2017

56

**Guard**

**PTI A**

**Issued: To be entered upon final issuance**

MAGLC (ug/m3): 10,333.3

Pollutant: toluene (28% of emissions)

TLV (mg/m3): 188.0

Emissions Unit ID: P007

**Issued: To be entered upon final issuance**

Maximum Hourly Emission Rate (lbs/hr): 9.24

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 806.6

MAGLC (ug/m3): 4,476.2

2. Physical changes to or changes in the method of operation of the emissions units after 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 (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.).
3. 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.
4. 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.

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-11424 Facility ID: 0339030016

FACILITY NAME Guardian Manufacturing Company Inc

FACILITY DESCRIPTION 2 large dip rings, 1 small dip ring, cure oven, form release dip tank and dry oven CITY/TWP Willard

SIC CODE 3069 SCC CODE 3-08-006-99 EMISSIONS UNIT ID P001

EMISSIONS UNIT DESCRIPTION large dip ring number 1 for butyl rubber gloves - modification to allow for an increase in production

DATE INSTALLED 1982

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 <sub>10</sub>   | attainment              |                       |                                   |                 |                                   |
| Sulfur Dioxide     | attainment              |                       |                                   |                 |                                   |
| Organic Compounds  | attainment              | 22.5 lbs/hr           | 98.6 P001, P002 and P004 combined | 22.5            | 98.6 P001, P002 and P004 combined |
| Nitrogen Oxides    | attainment              |                       |                                   |                 |                                   |
| Carbon Monoxide    | attainment              |                       |                                   |                 |                                   |
| Lead               | attainment              |                       |                                   |                 |                                   |
| Other: Air Toxics  | attainment              |                       |                                   |                 |                                   |

APPLICABLE FEDERAL RULES:

NSPS? n/a

NESHAP? n/a

PSD? n/a

OFFSET POLICY? n/a

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

use of carbon adsorption solvent recovery system

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$not specified

**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: xylene, toluene

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-11424 Facility ID: 0339030016

FACILITY NAME Guardian Manufacturing Company Inc

FACILITY DESCRIPTION 2 large dip rings. 1 small dip ring. cure CITY/TWP Willard

Emissions Unit ID: P007

SIC CODE 3069 SCC CODE 3-08-006-99 EMISSIONS UNIT ID P002

EMISSIONS UNIT DESCRIPTION small dip ring number 3 for butyl rubber gloves - modification to allow for an increase in production

DATE INSTALLED 1982

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 <sub>10</sub>   | attainment              |                       |                                   |                 |                                   |
| Sulfur Dioxide     | attainment              |                       |                                   |                 |                                   |
| Organic Compounds  | attainment              | 22.5 lbs/hr           | 98.6 P001, P002 and P004 combined | 22.5            | 98.6 P001, P002 and P004 combined |
| Nitrogen Oxides    | attainment              |                       |                                   |                 |                                   |
| Carbon Monoxide    | attainment              |                       |                                   |                 |                                   |
| Lead               | attainment              |                       |                                   |                 |                                   |
| Other: Air Toxics  | attainment              |                       |                                   |                 |                                   |

APPLICABLE FEDERAL RULES:

NSPS? n/a NESHAP? n/a PSD? n/a OFFSET POLICY? n/a

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

use of carbon adsorption solvent recovery system

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$not specified

**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: xylene, toluene

**NEW SC**

PTI Num

FACILITY

Emissions Unit ID: P007

FACILITY DESCRIPTION 2 large dip rings, 1 small dip ring, cure oven, form release dip tank and dry oven

CITY/TWP Willard

SIC CODE 3069 SCC CODE 3-08-006-99 EMISSIONS UNIT ID P004

EMISSIONS UNIT DESCRIPTION large dip ring number 2 for butyl rubber gloves - modification to allow for an increase in production

DATE INSTALLED 1982

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 <sub>10</sub>   | attainment              |                       |                                   |                 |                                   |
| Sulfur Dioxide     | attainment              |                       |                                   |                 |                                   |
| Organic Compounds  | attainment              | 22.5 lbs/hr           | 98.6 P001, P002 and P004 combined | 22.5            | 98.6 P001, P002 and P004 combined |
| Nitrogen Oxides    | attainment              |                       |                                   |                 |                                   |
| Carbon Monoxide    | attainment              |                       |                                   |                 |                                   |
| Lead               | attainment              |                       |                                   |                 |                                   |
| Other: Air Toxics  | attainment              |                       |                                   |                 |                                   |

APPLICABLE FEDERAL RULES:

NSPS? n/a

NESHAP? n/a

PSD? n/a

OFFSET POLICY? n/a

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

**use of carbon adsorption solvent recovery system**

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$not specified

**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: xylene, toluene

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-11424

Facility ID: 0339030016

FACILITY NAME Guardian Manufacturing Company Inc

FACILITY DESCRIPTION 2 large dip rings. 1 small dip ring. cure CITY/TWP Willard

Emissions Unit ID: P007

SIC CODE 3069

SCC CODE 3-08-006-99

EMISSIONS UNIT ID P005

EMISSIONS UNIT DESCRIPTION form release dip tank - modification to allow for an increase in production

DATE INSTALLED 1982

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 <sub>10</sub>   | attainment              |                       |               |                 |               |
| Sulfur Dioxide     | attainment              |                       |               |                 |               |
| Organic Compounds  | attainment              | 114.5                 | 40.0          | 114.5           | 40.0          |
| Nitrogen Oxides    | attainment              |                       |               |                 |               |
| Carbon Monoxide    | attainment              |                       |               |                 |               |
| Lead               | attainment              |                       |               |                 |               |
| Other: Air Toxics  | attainment              |                       |               |                 |               |

APPLICABLE FEDERAL RULES:

NPSPS? n/a

NESHAP? n/a

PSD? n/a

OFFSET POLICY? n/a

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

use of non-photochemically reactive materials

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$n/a

**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: ethanol

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-11424

Facility ID: 0339030016

FACILITY NAME Guardian Manufacturing Company Inc

FACILITY DESCRIPTION 2 large dip rings. 1 small dip ring. cure CITY/TWP Willard

Emissions Unit ID: P007

SIC CODE 3069

SCC CODE 3-08-006-99

EMISSIONS UNIT ID P006

EMISSIONS UNIT DESCRIPTION dry oven - modification to allow for an increase in production

DATE INSTALLED 1982

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 <sub>10</sub>   | attainment              |                       |               |                 |               |
| Sulfur Dioxide     | attainment              |                       |               |                 |               |
| Organic Compounds  | attainment              | 7.5                   | 32.8          | 7.5             | 32.8          |
| Nitrogen Oxides    | attainment              |                       |               |                 |               |
| Carbon Monoxide    | attainment              |                       |               |                 |               |
| Lead               | attainment              |                       |               |                 |               |
| Other: Air Toxics  | attainment              |                       |               |                 |               |

APPLICABLE FEDERAL RULES:

NSPS? n/a

NESHAP? n/a

PSD? n/a

OFFSET POLICY? n/a

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

compliance with the terms and conditions of this permit

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$n/a

**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: xylene, toluene

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-11424

Facility ID: 0339030016

FACILITY NAME Guardian Manufacturing Company Inc

FACILITY DESCRIPTION 2 large dip rings. 1 small dip ring. cure CITY/TWP Willard

Emissions Unit ID: P007

SIC CODE 3069 SCC CODE 3-08-006-99 EMISSIONS UNIT ID P007

EMISSIONS UNIT DESCRIPTION cure oven number 1 - modification to allow for an increase in production

DATE INSTALLED 1982

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 <sub>10</sub>   | attainment              |                       |               |                       |               |
| Sulfur Dioxide     | attainment              |                       |               |                       |               |
| Organic Compounds  | attainment              | 1.44                  | 2.74          | 3.0 lb/hr, 15 lbs/day | 2.74          |
| Nitrogen Oxides    | attainment              |                       |               |                       |               |
| Carbon Monoxide    | attainment              |                       |               |                       |               |
| Lead               | attainment              |                       |               |                       |               |
| Other: Air Toxics  | attainment              |                       |               |                       |               |

APPLICABLE FEDERAL RULES:

NSPS? n/a

NESHAP? n/a

PSD? n/a

OFFSET POLICY? n/a

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

**compliance with the terms and conditions of this permit**

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$n/a

**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: xylene, toluene