

Facility ID: 0332010055 Issuance type: Final State Permit To Operate

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

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

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

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[Go to Part II for Emissions Unit R025](#)

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Facility ID: 0332010055 Emissions Unit ID: R023 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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

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

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
adhesive spray booth	OAC rule 3745-21-07(G)(2)	None (see B.1).
	OAC rule 3745-17-11(B)(2)	None (see A.2.a).
	OAC rule 3745-17-07(A)(1)	None (see A.2.b).
	OAC rule 3745-31-05(A)(3) (PTI #03-13588, issued 03/06/01)	Adhesive Emissions: 2.63 lbs of organic compounds (OC)/hour; 11.52 tons of OC/year
		Cleanup Emissions: 10.75 lbs of OC/month; 0.06 ton of OC/year

**2. Additional Terms and Conditions**

- (a) The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the facility is located in Hancock County, which is identified as a P-2 county. This emissions unit is exempt from the visible PE limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable. The 2.63 pounds OC/hour emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with these limitation.

**B. Operational Restrictions**

1. The permittee shall not employ any adhesive coating or cleanup material in this emissions unit that is a photochemically reactive material.\* "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

\* This determination shall be made based on the actual formulation of the adhesive coatings and cleanup materials after any in-plant reducing or thinning and prior to the application of the product.

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

1. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the company identification for each adhesive coating and cleanup material employed;
  - b. documentation of whether or not each adhesive coating and cleanup material employed is a photochemically reactive material;
  - c. the number of gallons of each adhesive coating employed;
  - d. the number of gallons of each cleanup material employed;

- e. the OC content of each adhesive coating employed, in pounds per gallon, as applied;
  - f. the OC content of each cleanup material employed, in pounds per gallon;
  - g. the total OC emission rate, in pounds, for all the adhesive coatings material employed [summation of x e) for all adhesive coatings];
  - h. the total OC emission rate, in pounds, for all the cleanup materials employed [summation of (d x f) for all cleanup materials];
  - i. the annual, year-to-date, OC emissions, in tons, for all the adhesive coatings usage (sum of g for each calendar month to date from January to December, divided by 2000 lbs/ton); and
  - j. the annual, year-to-date, OC emissions, in tons, for all the coatings usage (sum of h for each calendar month to date from January to December, divided by 2000 lbs/ton).
2. The Permit to Install (PTI) for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit exhaust system, as specified by the permittee in the PTI application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by the emissions units using data from the PTI 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: Hexane  
 TLV (mg/m3): 176  
 Maximum Hourly Emission Rate (lbs/hr): 2.63  
 Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 824.30  
 MAGLC (ug/m3): 4190.98
3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- a. changes in the composition of the materials used (typically for coatings or 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.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing PTI will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final PTI prior to the change.
5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
- D. Reporting Requirements**
- 1. The permittee shall submit annual written reports that summarize the actual annual VOC emissions from the adhesive coating operations and the actual annual VOC emissions from the cleanup operations for this emissions unit. The reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
  - 2. The permittee shall notify the Northwest District Office, in writing, of any record showing the use of any photochemically reactive material in this emissions unit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.
- E. Testing Requirements**
- 1. Compliance with the emission limitations specified in section A.1 of this permit shall be determined in accordance with the following methods:  
 Emission Limitations:  
 2.63 lbs OC/hour; 11.52 tons OC/year (from the use of adhesives)  
  
 Applicable Compliance Method:

The hourly allowable OC emission limitation was established based on multiplying the maximum OC content of all the adhesive coatings employed (5.26 pounds per gallon) by the maximum adhesive coatings usage rate (0.50 gallon per hour).

Compliance with the annual allowable OC emission limitation shall be determined in accordance with the record keeping requirements specified in section C.1 of this permit.

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation based on the result of emission testing in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

Emission Limitation:  
10.75 lbs of OC/month and 0.06 ton of OC/year (from the use of cleanup)

Applicable Compliance Method:  
Compliance with the monthly and annual allowable OC emission limitations shall be determined in accordance with the record keeping requirements specified in section C.1 of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings and cleanup materials.

**F. Miscellaneous Requirements**

1. None

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Facility ID: 0332010055 Emissions Unit ID: R024 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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

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

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
adhesive spray booth	OAC rule 3745-21-07(G)(2)	None (see B.1).
	OAC rule 3745-17-11(B)(2)	None (see A.2.a).
	OAC rule 3745-17-07(A)(1)	None (see A.2.b).
	OAC rule 3745-31-05(A)(3) (PTI #03-13588, issued 03/06/01)	Adhesive Emissions: 2.63 lbs of organic compounds (OC)/hour; 11.52 tons of OC/year
		Cleanup Emissions: 10.75 lbs of OC/month; 0.06 ton of OC/year

**2. Additional Terms and Conditions**

- (a) The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the facility is located in Hancock County, which is identified as a P-2 county. This emissions unit is exempt from the visible PE limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable. The 2.63 pounds OC/hour emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with these limitation.

**B. Operational Restrictions**

1. The permittee shall not employ any adhesive coating or cleanup material in this emissions unit that is a photochemically reactive material.\* "Photochemically reactive material" is defined in OAC rule 3745-21-01(C) (5).

\* This determination shall be made based on the actual formulation of the adhesive coatings and cleanup materials after any in-plant reducing or thinning and prior to the application of the product.

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

1. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the company identification for each adhesive coating and cleanup material employed;
  - b. documentation of whether or not each adhesive coating and cleanup material employed is a photochemically reactive material;
  - c. the number of gallons of each adhesive coating employed;
  - d. the number of gallons of each cleanup material employed;
  - e. the OC content of each adhesive coating employed, in pounds per gallon, as applied;
  - f. the OC content of each cleanup material employed, in pounds per gallon;
  - g. the total OC emission rate, in pounds, for all the adhesive coatings material employed [summation of x e) for all adhesive coatings];
  - h. the total OC emission rate, in pounds, for all the cleanup materials employed [summation of (d x f) for all cleanup materials];
  - i. the annual, year-to-date, OC emissions, in tons, for all the adhesive coatings usage (sum of g for each calendar month to date from January to December, divided by 2000 lbs/ton); and
  - j. the annual, year-to-date, OC emissions, in tons, for all the coatings usage (sum of h for each calendar month to date from January to December, divided by 2000 lbs/ton).

2. The Permit to Install (PTI) for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit exhaust system, as specified by the permittee in the PTI application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by the emissions units using data from the PTI 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: Hexane  
 TLV (mg/m3): 176  
 Maximum Hourly Emission Rate (lbs/hr): 2.63  
 Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 824.30  
 MAGLC (ug/m3): 4190.98

3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a. changes in the composition of the materials used (typically for coatings or 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.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing PTI will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final PTI prior to the change.
5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**D. Reporting Requirements**

1. The permittee shall submit annual written reports that summarize the actual annual VOC emissions from the adhesive coating operations and the actual annual VOC emissions from the cleanup operations for this emissions unit. The reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
2. The permittee shall notify the Northwest District Office, in writing, of any record showing the use of any photochemically reactive material in this emissions unit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.

**E. Testing Requirements**

1. Compliance with the emission limitations specified in section A.1 of this permit shall be determined in accordance with the following methods:  
Emission Limitations:  
2.63 lbs OC/hour; 11.52 tons OC/year (from the use of adhesives)

Applicable Compliance Method:

The hourly allowable OC emission limitation was established based on multiplying the maximum OC content of all the adhesive coatings employed (5.26 pounds per gallon) by the maximum adhesive coatings usage rate (0.50 gallon per hour).

Compliance with the annual allowable OC emission limitation shall be determined in accordance with the record keeping requirements specified in section C.1 of this permit.

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation based on the result of emission testing in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

Emission Limitation:  
10.75 lbs of OC/month and 0.06 ton of OC/year (from the use of cleanup)

Applicable Compliance Method:

Compliance with the monthly and annual allowable OC emission limitations shall be determined in accordance with the record keeping requirements specified in section C.1 of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings and cleanup materials.

**F. Miscellaneous Requirements**

1. None

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Facility ID: 0332010055 Emissions Unit ID: R025 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

(a) None.

2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

(a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
adhesive spray booth	OAC rule 3745-21-07(G)(2)	None (see B.1).
	OAC rule 3745-17-11(B)(2)	None (see A.2.a).
	OAC rule 3745-17-07(A)(1)	None (see A.2.b).
	OAC rule 3745-31-05(A)(3) (PTI #03-13588, issued 03/06/01)	Adhesive Emissions: 2.63 lbs of organic compounds (OC)/hour; 11.52 tons of OC/year

Cleanup Emissions:  
10.75 lbs of OC/month;  
0.06 ton of OC/year

2. **Additional Terms and Conditions**

- (a) The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the facility is located in Hancock County, which is identified as a P-2 county.  
This emissions unit is exempt from the visible PE limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.  
The 2.63 pounds OC/hour emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with these limitation.

B. **Operational Restrictions**

1. The permittee shall not employ any adhesive coating or cleanup material in this emissions unit that is a photochemically reactive material.\* "Photochemically reactive material" is defined in OAC rule 3745-21-01(C) (5).

\* This determination shall be made based on the actual formulation of the adhesive coatings and cleanup materials after any in-plant reducing or thinning and prior to the application of the product.

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

1. The permittee shall collect and record the following information each month for this emissions unit:
- the company identification for each adhesive coating and cleanup material employed;
  - documentation of whether or not each adhesive coating and cleanup material employed is a photochemically reactive material;
  - the number of gallons of each adhesive coating employed;
  - the number of gallons of each cleanup material employed;
  - the OC content of each adhesive coating employed, in pounds per gallon, as applied;
  - the OC content of each cleanup material employed, in pounds per gallon;
  - the total OC emission rate, in pounds, for all the adhesive coatings material employed [summation of x e) for all adhesive coatings];
  - the total OC emission rate, in pounds, for all the cleanup materials employed [summation of (d x f) for all cleanup materials];
  - the annual, year-to-date, OC emissions, in tons, for all the adhesive coatings usage (sum of g for each calendar month to date from January to December, divided by 2000 lbs/ton); and
  - the annual, year-to-date, OC emissions, in tons, for all the coatings usage (sum of h for each calendar month to date from January to December, divided by 2000 lbs/ton).
2. The Permit to Install (PTI) for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit exhaust system, as specified by the permittee in the PTI application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by the emissions units using data from the PTI 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: Hexane  
TLV (mg/m3): 176  
Maximum Hourly Emission Rate (lbs/hr): 2.63  
Predicted 1-Hour Max. Ground-Level Concentration (ug/m3): 824.30  
MAGLC (ug/m3): 4190.98
3. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- 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;
  - 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
  - physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not

consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing PTI will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final PTI prior to the change.

5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**D. Reporting Requirements**

1. The permittee shall submit annual written reports that summarize the actual annual VOC emissions from the adhesive coating operations and the actual annual VOC emissions from the cleanup operations for this emissions unit. The reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
2. The permittee shall notify the Northwest District Office, in writing, of any record showing the use of any photochemically reactive material in this emissions unit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.

**E. Testing Requirements**

1. Compliance with the emission limitations specified in section A.1 of this permit shall be determined in accordance with the following methods:  
Emission Limitations:  
2.63 lbs OC/hour; 11.52 tons OC/year (from the use of adhesives)  
  
Applicable Compliance Method:  
  
The hourly allowable OC emission limitation was established based on multiplying the maximum OC content of all the adhesive coatings employed (5.26 pounds per gallon) by the maximum adhesive coatings usage rate (0.50 gallon per hour).  
  
Compliance with the annual allowable OC emission limitation shall be determined in accordance with the record keeping requirements specified in section C.1 of this permit.  
  
If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation based on the result of emission testing in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.  
Emission Limitation:  
10.75 lbs of OC/month and 0.06 ton of OC/year (from the use of cleanup)  
  
Applicable Compliance Method:  
Compliance with the monthly and annual allowable OC emission limitations shall be determined in accordance with the record keeping requirements specified in section C.1 of this permit.
2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings and cleanup materials.

**F. Miscellaneous Requirements**

1. None