

Facility ID: 0351010180 Issuance type: Title V Preliminary Proposed Permit

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 III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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Part II - Specific Facility Terms and Conditions

a State and Federally Enforceable Section

1. None

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b State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

B001 (Boiler #1-NOR)
B002 (Boiler #2-CLE)
B003 (Boiler #3-CLE)
B004 (Boiler #4-CLE)
Z001 (KBM Regrinder)

Each insignificant emissions unit at this facility must comply with all applicable state and federal regulations, as well as any emission limitations and/or control requirements contained within a permit to install (PTI) for the emissions unit.

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0351010180 Emissions Unit ID: P003 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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> |
|---|--------------------------------------|--|
| expandable polystyrene foam molding - pre-expansion and pre-puff storage operations | OAC rule 3745-31-05 (PTI #03-9258) | See A.I.2 below. |

2. Additional Terms and Conditions

- a. The combined emissions from emissions units P003 and P004 shall not exceed 123 tons of VOC/year, based upon a rolling, 12-month summation of the monthly VOC emission rates.
- b. The VOC content of the polymer beads employed in this emissions unit shall not exceed the following limits:
 - Bead I.D. VOC content, in weight percent (as received)
 - EPS 6.7%
 - ARCEL 13%
- c. The combined emissions from emissions units P003 and P004 shall not exceed 1.7 tons VOC/day.

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records and calculations of the following information for the polymer beads employed in emissions units P003 and P004, combined:
 - a. The company I.D. of each type of polymer beads employed.
 - b. The pounds of each type of polymer beads processed.
 - c. The VOC content of each type of polymer beads employed, in weight percent.
 - d. The amount of VOC emitted from each type of polymer beads (see Section A.III.4 for the method of calculation), in pounds.
 - e. The total amount of VOC emitted from all the types of polymer beads employed (summation of d for all types of beads, divided by 2000), in tons.
2. The permittee shall maintain monthly records and calculations of the following information for emissions units P003 and P004, combined:
 - a. the total amount of VOC emitted from all types of polymer beads employed, in tons [this is the summation

of the daily VOC emission rates (from Section III.1.e) for the calendar month]; and

- a. the rolling, 12-month summation of the monthly VOC emission rates (from all types of polymer beads employed), in tons.
3. The permittee shall require the bead supplier to submit a VOC content analysis for each lot of polymer beads and shall maintain records of such analyses.
4. The permittee shall use the following equation, as submitted in the PTI application dated September 27, 1995, to calculate the VOC emissions:

$E = \text{the summation of } [(U_e \times V_e \times L_e) \text{ for all lots of EPS beads used}] + \text{the summation of } [(U_a \times V_a \times L_a) \text{ for all lots of ARCEL beads used}]$

where:

E = total VOC emissions, in pounds/day

U_e = pounds from each lot of EPS beads used during the day

V_e = VOC content of each lot of EPS beads, in pounds of VOC per 100 pounds of beads

L_e = emission loss rate for EPS (see below)

U_a = pounds from each lot of ARCEL beads used during the day

V_a = VOC content of each lot of ARCEL beads, in pounds of VOC per 100 pounds of beads

L_a = emission loss rate for ARCEL beads (see below)

The current loss rates for conventional materials are 96% for EPS and 94% for ARCEL. Loss rates for low volatile materials are currently 97% for EPS and 93% for ARCEL. The permittee shall notify the Director (appropriate Ohio EPA District Office or local area agency) if these rates change.

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IV. Reporting Requirements

1. The permittee shall submit semi-annual deviation (excursion) reports that identify all exceedances of the rolling, 12-month VOC emission limitation (for emissions units P003 and P004, combined) of 123 tons. The reports shall be submitted by January 31 and July 31 of each year.
2. The permittee shall submit semi-annual deviation (excursion) reports that identify all exceedances of the daily VOC emission limitation of 1.7 tons (for emissions units P003 and P004, combined), the EPS bead VOC content limit of 6.7% by weight, and the ARCEL bead VOC content limit of 13% by weight, as well as the corrective action(s) that were taken to achieve compliance. The reports shall be submitted by January 31 and July 31 of each year.
3. The permittee shall submit annual reports that summarize the total amount of VOC emissions from emissions units P003 and P004, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

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V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
123 tons VOC per rolling, 12-month period

Applicable Compliance Method:
The record keeping requirements in Sections A.III.1, 2 and 4 shall be used to demonstrate compliance with the VOC emission limitation above.
 - b. VOC Content Limitation:
VOC content not to exceed 13.0% for ARCEL polymer beads

Applicable Compliance Method:
The VOC content analysis of each lot of polymer beads shall be used to determine compliance with the allowable VOC content of the ARCEL polymer beads.
 - c. VOC Content Limitation:
VOC content not to exceed 6.7% for EPS polymer beads

Applicable Compliance Method:
The VOC content analysis of each lot of polymer beads shall be used to determine compliance with the allowable VOC content of the EPS polymer beads.
 - d. Emission Limitation:
1.7 tons VOC/day

Applicable Compliance Method:
The record keeping requirements in Sections A.III.1 and 4 shall be used to demonstrate compliance with the allowable daily VOC emission limitation above.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0351010180 Emissions Unit ID: P003 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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> |
|---|--------------------------------------|--|
| expandable polystyrene foam molding - pre-expansion and pre-puff storage operations | OAC rule 3745-31-05 (PTI #03-9258) | See B.I.2 below. |

2. **Additional Terms and Conditions**

- a. VOC emissions resulting from processing EPS beads in this emissions unit shall not exceed 35 lbs/hour.*
- b. VOC emissions resulting from processing ARCEL beads in this emissions unit shall not exceed 34 lbs/hour.*
- c. VOC emissions resulting from processing EPS and ARCEL beads simultaneously in this emissions unit shall not exceed 69 lbs/hour.*

*The hourly limits above are based on the maximum input of materials as specified in the company's PTI application dated September 27, 1995. No additional record keeping or reporting is necessary to verify compliance with these limits provided the maximum capacities are not exceeded.

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II. **Operational Restrictions**

1. None

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

1. The permit to install for this emissions unit (P003) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied 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: pentane
 TLV (micrograms/m3): 1770
 Maximum Hourly Emission Rate (lbs/hr): 10.96
 Predicted 1-Hour Maximum Ground-Level Concentration (micrograms/m3): 686
 MAGLC (micrograms/m3): 42,142

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied.

Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- 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.
3. 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.

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IV. Reporting Requirements

1. None

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0351010180 Emissions Unit ID: P004 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. 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> |
|---|---------------------------------------|--|
| expandable polystyrene foam molding - pre-expansion and pre-puff storage operations | OAC rule 3745-31-05 (PTI #03-9258) | See A.I.2 below. |

2. **Additional Terms and Conditions**

- The combined emissions from emissions units P003 and P004 shall not exceed 123 tons of VOC/year, based upon a rolling, 12-month summation of the monthly VOC emission rates.
- The VOC content of the polymer beads employed in this emissions unit shall not exceed the following limits:
 - Bead I.D. VOC content, in weight percent (as received)
 - EPS 6.7%
 - ARCEL 13%
- The combined emissions from emissions units P003 and P004 shall not exceed 1.7 tons VOC/day.

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II. **Operational Restrictions**

- None

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

- The permittee shall maintain daily records and calculations of the following information for the polymer beads employed in emissions units P003 and P004, combined:
 - The company I.D. of each type of polymer beads employed.
 - The pounds of each type of polymer beads processed.
 - The VOC content of each type of polymer beads employed, in weight percent.
 - The amount of VOC emitted from each type of polymer beads (see Section A.III.4 for the method of calculation), in pounds.
 - The total amount of VOC emitted from all the types of polymer beads employed (summation of d for all types of beads, divided by 2000), in tons.
- The permittee shall maintain monthly records and calculations of the following information for emissions units P003 and P004, combined:
 - the total amount of VOC emitted from all types of polymer beads employed, in tons [this is the summation of the daily VOC emission rates (from Section III.1.e) for the calendar month]; and
 - the rolling, 12-month summation of the monthly VOC emission rates (from all types of polymer beads employed), in tons.
- The permittee shall require the bead supplier to submit a VOC content analysis for each lot of polymer beads and shall maintain records of such analyses.
- The permittee shall use the following equation, as submitted in the PTI application dated September 27, 1995, to calculate the VOC emissions:

$$E = \text{the summation of } [(U_e \times V_e \times L_e) \text{ for all lots of EPS beads used}] + \text{the summation of } [(U_a \times V_a \times L_a) \text{ for all lots of ARCEL beads used}]$$

where:

E = total VOC emissions, in pounds/day

U_e = pounds from each lot of EPS beads used during the day

V_e = VOC content of each lot of EPS beads, in pounds of VOC per 100 pounds of beads

L_e = emission loss rate for EPS (see below)

U_a = pounds from each lot of ARCEL beads used during the day

V_a = VOC content of each lot of ARCEL beads, in pounds of VOC per 100 pounds of beads

L_a = emission loss rate for ARCEL beads (see below)

The current loss rates for conventional materials are 96% for EPS and 94% for ARCEL. Loss rates for low volatile materials are currently 97% for EPS and 93% for ARCEL. The permittee shall notify the Director (appropriate Ohio EPA District Office or local area agency) if these rates change.

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IV. Reporting Requirements

1. The permittee shall submit semi-annual deviation (excursion) reports that identify all exceedances of the rolling, 12-month VOC emission limitation (for emissions units P003 and P004, combined) of 123 tons. The reports shall be submitted by January 31 and July 31 of each year.
2. The permittee shall submit semi-annual deviation (excursion) reports that identify all exceedances of the daily VOC emission limitation of 1.7 tons (for emissions units P003 and P004, combined), the EPS bead VOC content limit of 6.7% by weight, and the ARCEL bead VOC content limit of 13% by weight, as well as the corrective action(s) that were taken to achieve compliance. The reports shall be submitted by January 31 and July 31 of each year.
3. The permittee shall submit annual reports that summarize the total amount of VOC emissions from emissions units P003 and P004, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

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V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
123 tons VOC per rolling, 12-month period

Applicable Compliance Method:
The record keeping requirements in Sections A.III.1, 2 and 4 shall be used to demonstrate compliance with the VOC emission limitation above.
 - b. VOC Content Limitation:
VOC content not to exceed 13.0% for ARCEL polymer beads

Applicable Compliance Method:
The VOC content analysis of each lot of polymer beads shall be used to determine compliance with the allowable VOC content of the ARCEL polymer beads.
 - c. VOC Content Limitation:
VOC content not to exceed 6.7% for EPS polymer beads

Applicable Compliance Method:
The VOC content analysis of each lot of polymer beads shall be used to determine compliance with the allowable VOC content of the EPS polymer beads.
 - d. Emission Limitation:
1.7 tons VOC/day

Applicable Compliance Method:
The record keeping requirements in Sections A.III.1 and 4 shall be used to demonstrate compliance with the allowable daily VOC emission limitation above.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 0351010180 Emissions Unit ID: P004 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **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> |
|---|---------------------------------------|--|
| expandable polystyrene foam molding - pre-expansion and pre-puff storage operations | OAC rule 3745-31-05 (PTI #03-9258) | See B.I.2 below. |

2. **Additional Terms and Conditions**

- a. VOC emissions resulting from processing EPS beads in this emissions unit shall not exceed 35 lbs/hour.*
- b. VOC emissions resulting from processing ARCEL beads in this emissions unit shall not exceed 34 lbs/hour.*
- c. VOC emissions resulting from processing EPS and ARCEL beads simultaneously in this emissions unit shall not exceed 69 lbs/hour.*

*The hourly limits above are based on the maximum input of materials as specified in the company's PTI application dated September 27, 1995. No additional record keeping or reporting is necessary to verify compliance with these limits provided the maximum capacities are not exceeded.

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II. **Operational Restrictions**

1. None

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

1. The permit to install for this emissions unit (P004) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied 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: pentane
 TLV (micrograms/m3): 1770
 Maximum Hourly Emission Rate (lbs/hr): 10.96
 Predicted 1-Hour Maximum Ground-Level Concentration (micrograms/m3): 686
 MAGLC (micrograms/m3): 42,142

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- a. changes in the composition of the materials used, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- 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.
3. 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.

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None