



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 06-07530

Fac ID: 0660000023

DATE: 1/11/2005

The Ohio Plastics Company
Ken Ringold
PO Box 409 119 West Second Street
Frazeyburg, OH 43822

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

cc: USEPA

SEDO



**Permit To Install
Terms and Conditions**

**Issue Date: 1/11/2005
Effective Date: 1/11/2005**

FINAL PERMIT TO INSTALL 06-07530

Application Number: 06-07530
Facility ID: 0660000023
Permit Fee: **\$5100**
Name of Facility: The Ohio Plastics Company
Person to Contact: Ken Ringold
Address: PO Box 409 119 West Second Street
Frazeyburg, OH 43822

Location of proposed air contaminant source(s) [emissions unit(s)]:
**119 West Second Street
Frazeyburg, Ohio**

Description of proposed emissions unit(s):
Chap 31 mod of PTI 06-05329, issued 7/29/98, to increase OC emissions for 6 spray booths and 2 drying ovens; new app for 7 cleanup stations; syn min for OC and facility-wide HAPs.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. 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

The permittee shall submit required reports in the following manner:

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

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.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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 verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. 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 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. 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 emissions unit(s) that is (are) served by such control system(s).

6. 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.

7. 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.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. 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

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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.

10. 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.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. 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.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This 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 ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

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14. 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.

15. 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.

B. 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>
PE	67.8
OC	90.66
single HAP	9.9
combined HAPs	24.9

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
P001 - Drying Oven	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 70 pounds (lbs)/day and 12.78 tons/year (TPY).
Chapter 31 modification of PTI 06-05329, issued 7/29/98, to increase allowable OC emissions.	OAC rule 3745-35-07(B)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07(B) and OAC rule 3745-21-07(G)(1).
	OAC rule 3745-21-07(G)(1)	Emissions of any single hazardous air pollutant (HAP) from this facility shall be less than 9.9 tons as a rolling, 12-month summation.
		Emissions of any combination of HAPs from this facility shall be less than 24.9 tons as a rolling, 12-month summation.
		See Sections A.2.a and B.1 below.
		See Section A.2.b below.

2. Additional Terms and Conditions

- 2.a** For purposes of limiting facility-wide HAPs emissions, the facility is comprised of the following emissions units: P001, P002, P003, P004, P005, P006, P007, P008, P009, R101, R102, R103, R104, R105, and R106.
- 2.b** This emissions unit is exempt from the organic compound emission limitations specified in OAC rule 3745-21-07(G)(1) because the coatings are not baked, heat-cured, or heat-polymerized.

B. Operational Restrictions

1. The permittee has requested a federally enforceable limitation on facility-wide HAPs emissions for purposes of limiting potential to emit. Therefore, the maximum facility-wide HAPs emissions shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, based on rolling, 12-month summations. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAPs emissions specified in the following table:

<u>Month(s)</u>	<u>Maximum facility-wide single HAP emissions (tons)</u>	<u>Maximum facility-wide combined HAPs emissions (tons)</u>
1	0.9	2.1
1-2	1.8	4.2
1-3	2.7	6.3
1-4	3.6	8.4
1-5	4.5	10.5
1-6	5.4	12.6
1-7	6.3	14.7
1-8	7.2	16.8
1-9	8.1	18.9
1-10	9.0	21.0
1-11	9.9	23.1
1-12	9.9	24.9

After the first 12 calendar months of operation following issuance of this permit, compliance with the HAPs emissions limitations shall be based on rolling, 12-month summations.

C. Monitoring and/or Recordkeeping Requirements

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

- a. the total daily OC emission rate for all coatings employed in the coating operations associated with this emissions unit, in pounds per day; and
 - b. the daily OC emission rate from this emissions unit, in pounds per day (i.e., the value in C.1.a multiplied by the coating booth transfer efficiency (0.4), and multiplied by the estimated OC retention from the booth to the oven (0.15)).
2. The permittee shall collect and record the following information each month for the facility:
- a. the name and identification number of each coating, thinner, and cleanup material employed;
 - b. the individual HAP* content for each HAP of each coating and cleanup material, in pounds of individual HAP per gallon;
 - c. the number of gallons of each coating, thinner, and cleanup material employed;
 - d. the total pounds of each individual HAP recovered in solvent waste;
 - e. the total individual HAP emissions for each HAP from all coatings, thinners, and cleanup materials, in tons per month (i.e., the sum of [(C.2.b.) x (C.2.c.) - (C.2.d)] for each individual HAP, divided by 2,000 lbs/ton.);
 - f. the rolling, 12-month summation of the total individual HAP emissions from all emissions units at the facility, in tons;
 - g. the total combined HAP emissions from all coatings, thinners, and cleanup materials, in tons per month (i.e., sum of individual HAP emissions from all coatings and cleanup materials as determined in C.2.e); and
 - h. the rolling, 12-month summation of the total combined HAP emissions from all emissions units at the facility, in tons.
- *A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Ohio EPA Southeast District Office. This information does not have to be kept on a line-by-line basis.
3. The permit to install for this emissions unit (P001) 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. The Ohio EPA's

Emissions Unit ID: **P001**

"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: Methyl Ethyl Ketone (MEK)

TLV (mg/m³): 589,780

Maximum Hourly Emission Rate (lbs/hr): 1.37

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 408

MAGLC (ug/m³): 14,042

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.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a

modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, 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.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that include the following:
 - a. an identification of each day during which the daily OC emissions rate exceeded 70 lbs/day, and the actual OC emission rate for each such day;
 - b. for the first 12 calendar months of operation following the issuance of this permit, an identification of all exceedances of the maximum allowable cumulative facility-wide single HAP emissions and facility-wide combined HAPs emissions; and
 - c. beginning after the first 12 calendar months of operation following the issuance of this permit, any exceedance of the rolling, 12-month facility-wide single HAP and combined HAPs limitations.

These deviation (excursion) reports shall be submitted in accordance with Section A.2 of the General Terms and Conditions of this permit.

E. Testing Requirements

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

- a. Emission Limitation:
OC emissions shall not exceed 70 lbs/day and 12.78 TPY.
- Applicable Compliance Method:
Compliance with the daily emission rate shall be determined based on the record keeping requirements specified in Section C.1. Compliance with the annual emission rate shall be determined based on the summation of the daily OC emission rates for the calendar year divided by 2000 lbs/ton.
- b. Emission Limitation:
Emissions of any single HAP from this facility shall be less than 9.9 tons as a rolling, 12-month summation.
- Applicable Compliance Method:
Compliance shall be determined based on the record keeping requirements specified in Section C.2.
- c. Emission Limitation:
Emissions of any combination of HAPs from this facility shall be less than 24.9 tons as a rolling, 12-month summation.
- Applicable Compliance Method:
Compliance shall be determined based on the record keeping requirements specified in Section C.2.

F. Miscellaneous Requirements

None.

Emissions Unit ID: **P002**

- 2.a** For purposes of limiting facility-wide HAPs emissions, the facility is comprised of the following emissions units: P001, P002, P003, P004, P005, P006, P007, P008, P009, R101, R102, R103, R104, R105, and R106.
- 2.b** This emissions unit is exempt from the organic compound emission limitations specified in OAC rule 3745-21-07(G)(1) because the coatings are not baked, heat-cured, or heat-polymerized.

B. Operational Restrictions

1. The permittee has requested a federally enforceable limitation on facility-wide HAPs emissions for purposes of limiting potential to emit. Therefore, the maximum facility-wide HAPs emissions shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, based on rolling, 12-month summations. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAPs emissions specified in the following table:

<u>Month(s)</u>	<u>Maximum facility-wide single HAP emissions (tons)</u>	<u>Maximum facility-wide combined HAPs emissions (tons)</u>
1	0.9	2.1
1-2	1.8	4.2
1-3	2.7	6.3
1-4	3.6	8.4
1-5	4.5	10.5
1-6	5.4	12.6
1-7	6.3	14.7
1-8	7.2	16.8
1-9	8.1	18.9
1-10	9.0	21.0
1-11	9.9	23.1
1-12	9.9	24.9

After the first 12 calendar months of operation following issuance of this permit, compliance with the HAPs emissions limitations shall be based on rolling, 12-month summations.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day:
- a. the total daily OC emission rate for all coatings employed in the coating operations

- associated with this emissions unit, in pounds per day; and
- b. the daily OC emission rate from this emissions unit, in pounds per day (i.e., the value in C.1.a multiplied by the coating booth transfer efficiency (0.4), and multiplied by the estimated OC retention from the booth to the oven (0.15)).
2. The permittee shall collect and record the following information each month for the facility:
- a. the name and identification number of each coating, thinner, and cleanup material employed;
 - b. the individual HAP* content for each HAP of each coating and cleanup material, in pounds of individual HAP per gallon;
 - c. the number of gallons of each coating, thinner, and cleanup material employed;
 - d. the total pounds of each individual HAP recovered in solvent waste;
 - e. the total individual HAP emissions for each HAP from all coatings, thinners, and cleanup materials, in tons per month (i.e., the sum of [(C.2.b.) x (C.2.c.) - (C.2.d)] for each individual HAP, divided by 2,000 lbs/ton.);
 - f. the rolling, 12-month summation of the total individual HAP emissions from all emissions units at the facility, in tons;
 - g. the total combined HAP emissions from all coatings, thinners, and cleanup materials, in tons per month (i.e., sum of individual HAP emissions from all coatings and cleanup materials as determined in C.2.e); and
 - h. the rolling, 12-month summation of the total combined HAP emissions from all emissions units at the facility, in tons.

*A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Ohio EPA Southeast District Office. This information does not have to be kept on a line-by-line basis.

3. The permit to install for this emissions unit (P002) 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. 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: Methyl Ethyl Ketone (MEK)

TLV (mg/m³): 589,780

Maximum Hourly Emission Rate (lbs/hr): 1.37

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 408

MAGLC (ug/m³): 14,042

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 (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.).

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

Emissions Unit ID: **P002**

modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, 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.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that include the following:
 - a. an identification of each day during which the daily OC emissions rate exceeded 70 lbs/day, and the actual OC emission rate for each such day;
 - b. for the first 12 calendar months of operation following the issuance of this permit, an identification of all exceedances of the maximum allowable cumulative facility-wide single HAP emissions and facility-wide combined HAPs emissions; and
 - c. beginning after the first 12 calendar months of operation following the issuance of this permit, any exceedance of the rolling, 12-month facility-wide single HAP and combined HAPs limitations.

These deviation (excursion) reports shall be submitted in accordance with Section A.2 of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

OC emissions shall not exceed 70 lbs/day and 12.78 TPY.

Applicable Compliance Method:

Compliance with the daily emission rate shall be determined based on the record keeping requirements specified in Section C.1. Compliance with the annual emission rate shall be determined based on the summation of the daily OC emission rates for the calendar year divided by 2000 lbs/ton.

- b. **Emission Limitation:**
Emissions of any single HAP from this facility shall be less than 9.9 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on the record keeping requirements specified in Section C.2.

- c. **Emission Limitation:**
Emissions of any combination of HAPs from this facility shall be less than 24.9 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on the record keeping requirements specified in Section C.2.

F. Miscellaneous Requirements

None.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>	OAC rule 3745-21-07(G)
P003 - Cleanup Area No. 1	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-35-07(B)	

Applicable Emissions
Limitations/Control Measures

Organic compound (OC) emissions shall not exceed 48 pounds (lbs)/day.

See Section B.1 below.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07(B) and OAC rule 3745-21-07(G).

Emissions of any single hazardous air pollutant (HAP) from this facility shall be less than 9.9 tons as a rolling, 12-month summation.

Emissions of any combination of HAPs from this facility shall be less than 24.9 tons as a rolling, 12-month summation.

OC emissions from emissions units P003, P004, P005, P006, P007, P008, and P009 combined shall not exceed 14.0 tons as a rolling, 12-month summation.

See Sections A.2.a, B.1, B.2, and B.3 below.

Exempt. See Section A.2.b below.

2. Additional Terms and Conditions

- 2.a** For purposes of limiting facility-wide HAPs emissions, the facility is comprised of the following emissions units: P001, P002, P003, P004, P005, P006, P007, P008, P009, R101, R102, R103, R104, R105, and R106.
- 2.b** The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

B. Operational Restrictions

- For purposes of demonstrating compliance with the Ohio Air Toxics Policy, only six of the seven cleanup area emissions units identified as P003, P004, P005, P006, P007, P008, and P009 may employ isopropyl alcohol on a given day.
- The permittee has requested a federally enforceable limitation on facility-wide HAPs emissions for purposes of limiting potential to emit. Therefore, the maximum facility-wide HAPs emissions shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, based on rolling, 12-month summations. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAPs emissions specified in the following table:

<u>Month(s)</u>	<u>Maximum facility-wide single HAP emissions (tons)</u>	<u>Maximum facility-wide combined HAPs emissions (tons)</u>
1	0.9	2.1
1-2	1.8	4.2
1-3	2.7	6.3
1-4	3.6	8.4
1-5	4.5	10.5
1-6	5.4	12.6
1-7	6.3	14.7
1-8	7.2	16.8
1-9	8.1	18.9
1-10	9.0	21.0
1-11	9.9	23.1
1-12	9.9	24.9

After the first 12 calendar months of operation following issuance of this permit, compliance with the HAPs emissions limitations shall be based on rolling, 12-month summations.

3. The maximum material usage for emissions units P003, P004, P005, P006, P007, P008, and P009 combined shall not cause OC emissions to exceed 14.0 tons as a rolling, 12-month summation, calculated using the following formula:

$$14.0 \text{ tons OC} \geq \sum_{n=1}^i \frac{(P_i)(OC_i)}{2000 \text{ lbs/ton}}$$

where:

P_i = usage of cleanup material i in gallons

OC_i = Organic compound content of cleanup material i in pounds OC per gallon.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the material usage for emissions units P003, P004, P005, P006, P007, P008, and P009 combined shall not cause OC emissions to exceed the rates specified in the following table:

<u>Month(s)</u>	<u>Maximum allowable OC emissions (tons)</u>
1	1.2
1-2	2.4
1-3	3.6
1-4	4.8
1-5	6.0
1-6	7.2
1-7	8.4
1-8	9.6
1-9	10.8
1-10	12.0
1-11	13.2
1-12	14.0

After the first 12 calendar months of operation following issuance of this permit, compliance with the combined OC limitation shall be based on a rolling, 12-month summation.

C. Monitoring and/or Recordkeeping Requirements

Emissions Unit ID: **P003**

1. The permittee shall collect and record the following information each day for the cleanup operation:
 - a. the company name and identification of each cleanup material employed in this emissions unit;
 - b. whether or not each cleanup material employed is a photochemically reactive material;
 - c. the number of gallons of each cleanup material employed;
 - d. the OC content of each cleanup material employed, in pounds per gallon;
 - e. the total OC emission rate for all cleanup materials employed, in pounds (i.e., the sum of [(C.1.c) x (C.1.d)] for all cleanup materials employed); and
 - f. whether or not isopropyl alcohol was used in each of emissions units P003-P009.

2. The permittee shall collect and record the following information each month for the facility:
 - a. the name and identification number of each coating, thinner, and cleanup material employed;
 - b. the individual HAP* content for each HAP of each coating and cleanup material, in pounds of individual HAP per gallon;
 - c. the number of gallons of each coating, thinner, and cleanup material employed;
 - d. the total pounds of each individual HAP recovered in solvent waste;
 - e. the total individual HAP emissions for each HAP from all coatings, thinners, and cleanup materials, in tons per month (i.e., the sum of [(C.2.b.) x (C.2.c.) - (C.2.d)] for each individual HAP, divided by 2,000 lbs/ton);
 - f. the rolling, 12-month summation of the total individual HAP emissions from all emissions units at the facility, in tons (i.e. the sum of individual HAP emissions for the current month and the preceding eleven calendar months);
 - g. the total combined HAP emissions from all coatings, thinners, and cleanup materials, in tons per month (i.e., sum of individual HAP emissions from all coatings and cleanup materials as determined in C.2.e); and

- h. the rolling, 12-month summation of the total combined HAP emissions from all emissions units at the facility, in tons (i.e. the sum of combined HAP emissions for the current month and the preceding eleven calendar months).

*A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Southeast District Office. This information does not have to be kept on a line-by-line basis.

3. The permittee shall collect and record the following information each month for emissions units P003, P004, P005, P006, P007, P008, and P009 combined:
 - a. the total OC emissions for each month, in tons, calculated according to the formula specified in Section B.3; and
 - b. the rolling, 12-month summation of the total OC emissions, in tons (i.e., the sum of the total combined OC emissions for the current month and the preceding eleven calendar months).
4. The permit to install for this emissions unit (P003) 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. 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: Isopropyl Alcohol

TLV (mg/m³): 491.5

Maximum Hourly Emission Rate (lbs/hr): 2.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1,699

MAGLC (ug/m³): 11,702

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

Emissions Unit ID: P003

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.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install 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 notify the Ohio EPA Southeast District Office in writing of any daily record showing that photochemically reactive materials were employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Ohio EPA Southeast District Office within 30 days after the event occurs.
2. The permittee shall notify the Ohio EPA Southeast District Office in writing of any daily record showing that isopropyl alcohol was employed in more than six of the seven emissions units P003, P004, P005, P006, P007, P008, and P009. The notification shall include a copy of such record and shall be sent to the Ohio EPA Southeast District Office within 30 days after the event occurs.
3. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of each day during which the daily OC emissions rate exceeded 48 lbs/day, and the actual OC emission rate for each such day;
 - b. for the first 12 calendar months of operation following the issuance of this permit, an identification of all exceedances of the maximum allowable cumulative facility-wide single HAP emissions and facility-wide combined HAPs emissions;
 - c. beginning after the first 12 calendar months of operation following the issuance of this permit, an identification of all exceedances of the rolling, 12-month facility-wide single HAP and combined HAPs limitations;
 - d. for the first 12 calendar months of operation following the issuance of this permit, an identification of all exceedances of the maximum allowable cumulative OC limitation; and
 - e. beginning after the first 12 calendar months of operation following the issuance of this permit, an identification of all exceedances of the rolling, 12-month OC limitation for emissions units P003, P004, P005, P006, P007, P008, and P009 combined.

These reports shall be submitted in accordance with Section A.2 of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

OC emissions shall not exceed 48 lbs/day.

Applicable Compliance Method:

Compliance shall be determined based on the record keeping requirements specified in Section C.1.

- b. Emission Limitation:
Emissions of any single HAP from this facility shall be less than 9.9 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on the record keeping requirements specified in Section C.2.

- c. Emission Limitation:
Emissions of any combination of HAPs from this facility shall be less than 24.9 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on the record keeping requirements specified in Section C.2.

- d. Emission Limitation:
OC emissions from emissions units P003, P004, P005, P006, P007, P008, and P009 combined shall not exceed 14.0 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on the record keeping requirements specified in Section C.3.

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

F. Miscellaneous Requirements

None.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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.

Operations, Property, and/or Equipment	<u>Applicable Rules/Requirements</u>	
P004 - Cleanup Area No. 2	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-07(G)
	OAC rule 3745-35-07(B)	

Applicable Emissions
Limitations/Control Measures

Organic compound (OC) emissions shall not exceed 48 pounds (lbs)/day.

See Section B.1 below.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07(B) and OAC rule 3745-21-07(G).

Emissions of any single hazardous air pollutant (HAP) from this facility shall be less than 9.9 tons as a rolling, 12-month summation.

Emissions of any combination of HAPs from this facility shall be less than 24.9 tons as a rolling, 12-month summation.

OC emissions from emissions units P003, P004, P005, P006, P007, P008, and P009 combined shall not exceed 14.0 tons as a rolling, 12-month summation.

See Sections A.2.a, B.1, B.2, and B.3 below.

Exempt. See Section A.2.b below.

2. Additional Terms and Conditions

- 2.a** For purposes of limiting facility-wide HAPs emissions, the facility is comprised of the following emissions units: P001, P002, P003, P004, P005, P006, P007, P008, P009, R101, R102, R103, R104, R105, and R106.
- 2.b** The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

B. Operational Restrictions

- For purposes of demonstrating compliance with the Ohio Air Toxics Policy, only six of the seven cleanup area emissions units identified as P003, P004, P005, P006, P007, P008, and P009 may employ isopropyl alcohol on a given day.
- The permittee has requested a federally enforceable limitation on facility-wide HAPs emissions for purposes of limiting potential to emit. Therefore, the maximum facility-wide HAPs emissions shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, based on rolling, 12-month summations. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAPs emissions specified in the following table:

<u>Month(s)</u>	<u>Maximum facility-wide single HAP emissions (tons)</u>	<u>Maximum facility-wide combined HAPs emissions (tons)</u>
1	0.9	2.1
1-2	1.8	4.2
1-3	2.7	6.3
1-4	3.6	8.4
1-5	4.5	10.5
1-6	5.4	12.6
1-7	6.3	14.7
1-8	7.2	16.8
1-9	8.1	18.9
1-10	9.0	21.0
1-11	9.9	23.1
1-12	9.9	24.9

After the first 12 calendar months of operation following issuance of this permit, compliance with the HAPs emissions limitations shall be based on rolling, 12-month summations.

Emissions Unit ID: P004

3. The maximum material usage for emissions units P003, P004, P005, P006, P007, P008, and P009 combined shall not cause OC emissions to exceed 14.0 tons as a rolling, 12-month summation, calculated using the following formula:

$$14.0 \text{ tons OC} \geq \sum_{n=1}^i \frac{(P_i)(OC_i)}{2000 \text{ lbs/ton}}$$

where:

P_i = usage of cleanup material i in gallons

OC_i = Organic compound content of cleanup material i in pounds OC per gallon.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the material usage for emissions units P003, P004, P005, P006, P007, P008, and P009 combined shall not cause OC emissions to exceed the rates specified in the following table:

<u>Month(s)</u>	<u>Maximum allowable OC emissions (tons)</u>
1	1.2
1-2	2.4
1-3	3.6
1-4	4.8
1-5	6.0
1-6	7.2
1-7	8.4
1-8	9.6
1-9	10.8
1-10	12.0
1-11	13.2
1-12	14.0

After the first 12 calendar months of operation following issuance of this permit, compliance with the combined OC limitation shall be based on a rolling, 12-month summation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the cleanup operation:

- a. the company name and identification of each cleanup material employed in this emissions unit;
 - b. whether or not each cleanup material employed is a photochemically reactive material;
 - c. the number of gallons of each cleanup material employed;
 - d. the OC content of each cleanup material employed, in pounds per gallon;
 - e. the total OC emission rate for all cleanup materials employed, in pounds (i.e., the sum of [(C.1.c) x (C.1.d)] for all cleanup materials employed); and
 - f. whether or not isopropyl alcohol was used in each of emissions units P003-P009.
2. The permittee shall collect and record the following information each month for the facility:
- a. the name and identification number of each coating, thinner, and cleanup material employed;
 - b. the individual HAP* content for each HAP of each coating and cleanup material, in pounds of individual HAP per gallon;
 - c. the number of gallons of each coating, thinner, and cleanup material employed;
 - d. the total pounds of each individual HAP recovered in solvent waste;
 - e. the total individual HAP emissions for each HAP from all coatings, thinners, and cleanup materials, in tons per month (i.e., the sum of [(C.2.b.) x (C.2.c.) - (C.2.d)] for each individual HAP, divided by 2,000 lbs/ton);
 - f. the rolling, 12-month summation of the total individual HAP emissions from all emissions units at the facility, in tons (i.e. the sum of individual HAP emissions for the current month and the preceding eleven calendar months);
 - g. the total combined HAP emissions from all coatings, thinners, and cleanup materials, in tons per month (i.e., sum of individual HAP emissions from all coatings and cleanup materials as determined in C.2.e); and

- h. the rolling, 12-month summation of the total combined HAP emissions from all emissions units at the facility, in tons (i.e. the sum of combined HAP emissions for the current month and the preceding eleven calendar months).

*A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Southeast District Office. This information does not have to be kept on a line-by-line basis.

3. The permittee shall collect and record the following information each month for emissions units P003, P004, P005, P006, P007, P008, and P009 combined:
 - a. the total OC emissions for each month, in tons, calculated according to the formula specified in Section B.3; and
 - b. the rolling, 12-month summation of the total OC emissions, in tons (i.e., the sum of the total combined OC emissions for the current month and the preceding eleven calendar months).
4. The permit to install for this emissions unit (P004) 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. 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: Isopropyl Alcohol

TLV (mg/m³): 491.5

Maximum Hourly Emission Rate (lbs/hr): 2.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1,699

MAGLC (ug/m³): 11,702

Physical changes to or changes in the method of operation of the emissions unit after its

Emissions Unit ID: **P004**

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.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install 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 notify the Ohio EPA Southeast District Office in writing of any daily record showing that photochemically reactive materials were employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Ohio EPA Southeast District Office within 30 days after the event occurs.
2. The permittee shall notify the Ohio EPA Southeast District Office in writing of any daily record showing that isopropyl alcohol was employed in more than six of the seven emissions units P003, P004, P005, P006, P007, P008, and P009. The notification shall include a copy of such record and shall be sent to the Ohio EPA Southeast District Office within 30 days after the event occurs.
3. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of each day during which the daily OC emissions rate exceeded 48 lbs/day, and the actual OC emission rate for each such day;
 - b. for the first 12 calendar months of operation following the issuance of this permit, an identification of all exceedances of the maximum allowable cumulative facility-wide single HAP emissions and facility-wide combined HAPs emissions;
 - c. beginning after the first 12 calendar months of operation following the issuance of this permit, an identification of all exceedances of the rolling, 12-month facility-wide single HAP and combined HAPs limitations;
 - d. for the first 12 calendar months of operation following the issuance of this permit, an identification of all exceedances of the maximum allowable cumulative OC limitation; and
 - e. beginning after the first 12 calendar months of operation following the issuance of this permit, an identification of all exceedances of the rolling, 12-month OC limitation for emissions units P003, P004, P005, P006, P007, P008, and P009 combined.

These reports shall be submitted in accordance with Section A.2 of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

OC emissions shall not exceed 48 lbs/day.

Applicable Compliance Method:

Compliance shall be determined based on the record keeping requirements specified in Section C.1.

- b. Emission Limitation:
Emissions of any single HAP from this facility shall be less than 9.9 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on the record keeping requirements specified in Section C.2.

- c. Emission Limitation:
Emissions of any combination of HAPs from this facility shall be less than 24.9 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on the record keeping requirements specified in Section C.2.

- d. Emission Limitation:
OC emissions from emissions units P003, P004, P005, P006, P007, P008, and P009 combined shall not exceed 14.0 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on the record keeping requirements specified in Section C.3.

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

F. Miscellaneous Requirements

None.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>	
P005 - Cleanup Area No. 3	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-07(G)
	OAC rule 3745-35-07(B)	

Applicable Emissions
Limitations/Control Measures

Organic compound (OC) emissions shall not exceed 48 pounds (lbs)/day.

See Section B.1 below.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07(B) and OAC rule 3745-21-07(G).

Emissions of any single hazardous air pollutant (HAP) from this facility shall be less than 9.9 tons as a rolling, 12-month summation.

Emissions of any combination of HAPs from this facility shall be less than 24.9 tons as a rolling, 12-month summation.

OC emissions from emissions units P003, P004, P005, P006, P007, P008, and P009 combined shall not exceed 14.0 tons as a rolling, 12-month summation.

See Sections A.2.a, B.1, B.2, and B.3 below.

Exempt. See Section A.2.b below.

2. Additional Terms and Conditions

- 2.a** For purposes of limiting facility-wide HAPs emissions, the facility is comprised of the following emissions units: P001, P002, P003, P004, P005, P006, P007, P008, P009,

R101, R102, R103, R104, R105, and R106.

- 2.b** The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

B. Operational Restrictions

- For purposes of demonstrating compliance with the Ohio Air Toxics Policy, only six of the seven cleanup area emissions units identified as P003, P004, P005, P006, P007, P008, and P009 may employ isopropyl alcohol on a given day.
- The permittee has requested a federally enforceable limitation on facility-wide HAPs emissions for purposes of limiting potential to emit. Therefore, the maximum facility-wide HAPs emissions shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, based on rolling, 12-month summations. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAPs emissions specified in the following table:

<u>Month(s)</u>	<u>Maximum facility-wide single HAP emissions (tons)</u>	<u>Maximum facility-wide combined HAPs emissions (tons)</u>
1	0.9	2.1
1-2	1.8	4.2
1-3	2.7	6.3
1-4	3.6	8.4
1-5	4.5	10.5
1-6	5.4	12.6
1-7	6.3	14.7
1-8	7.2	16.8
1-9	8.1	18.9
1-10	9.0	21.0
1-11	9.9	23.1
1-12	9.9	24.9

After the first 12 calendar months of operation following issuance of this permit, compliance with the HAPs emissions limitations shall be based on rolling, 12-month summations.

- The maximum material usage for emissions units P003, P004, P005, P006, P007, P008, and P009 combined shall not cause OC emissions to exceed 14.0 tons as a rolling, 12-month summation,

calculated using the following formula:

$$14.0 \text{ tons OC} \geq \sum_{n=1}^i \frac{(P_i)(OC_i)}{2000 \text{ lbs/ton}}$$

where:

P_i = usage of cleanup material i in gallons

OC_i = Organic compound content of cleanup material i in pounds OC per gallon.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the material usage for emissions units P003, P004, P005, P006, P007, P008, and P009 combined shall not cause OC emissions to exceed the rates specified in the following table:

<u>Month(s)</u>	<u>Maximum allowable OC emissions (tons)</u>
1	1.2
1-2	2.4
1-3	3.6
1-4	4.8
1-5	6.0
1-6	7.2
1-7	8.4
1-8	9.6
1-9	10.8
1-10	12.0
1-11	13.2
1-12	14.0

After the first 12 calendar months of operation following issuance of this permit, compliance with the combined OC limitation shall be based on a rolling, 12-month summation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the cleanup operation:

- a. the company name and identification of each cleanup material employed in this emissions unit;
 - b. whether or not each cleanup material employed is a photochemically reactive material;
 - c. the number of gallons of each cleanup material employed;
 - d. the OC content of each cleanup material employed, in pounds per gallon;
 - e. the total OC emission rate for all cleanup materials employed, in pounds (i.e., the sum of [(C.1.c) x (C.1.d)] for all cleanup materials employed); and
 - f. whether or not isopropyl alcohol was used in each of emissions units P003-P009.
2. The permittee shall collect and record the following information each month for the facility:
- a. the name and identification number of each coating, thinner, and cleanup material employed;
 - b. the individual HAP* content for each HAP of each coating and cleanup material, in pounds of individual HAP per gallon;
 - c. the number of gallons of each coating, thinner, and cleanup material employed;
 - d. the total pounds of each individual HAP recovered in solvent waste;
 - e. the total individual HAP emissions for each HAP from all coatings, thinners, and cleanup materials, in tons per month (i.e., the sum of [(C.2.b.) x (C.2.c.) - (C.2.d)] for each individual HAP, divided by 2,000 lbs/ton);
 - f. the rolling, 12-month summation of the total individual HAP emissions from all emissions units at the facility, in tons (i.e. the sum of individual HAP emissions for the current month and the preceding eleven calendar months);
 - g. the total combined HAP emissions from all coatings, thinners, and cleanup materials, in tons per month (i.e., sum of individual HAP emissions from all coatings and cleanup materials as determined in C.2.e); and

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- h. the rolling, 12-month summation of the total combined HAP emissions from all emissions units at the facility, in tons (i.e. the sum of combined HAP emissions for the current month and the preceding eleven calendar months).

*A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Southeast District Office. This information does not have to be kept on a line-by-line basis.

3. The permittee shall collect and record the following information each month for emissions units P003, P004, P005, P006, P007, P008, and P009 combined:
 - a. the total OC emissions for each month, in tons, calculated according to the formula specified in Section B.3; and
 - b. the rolling, 12-month summation of the total OC emissions, in tons (i.e., the sum of the total combined OC emissions for the current month and the preceding eleven calendar months).
4. The permit to install for this 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. 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: Isopropyl Alcohol

TLV (mg/m³): 491.5

Maximum Hourly Emission Rate (lbs/hr): 2.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1,699

MAGLC (ug/m³): 11,702

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.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install 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 notify the Ohio EPA Southeast District Office in writing of any daily record showing that photochemically reactive materials were employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Ohio EPA Southeast District Office within 30 days after the event occurs.
2. The permittee shall notify the Ohio EPA Southeast District Office in writing of any daily record showing that isopropyl alcohol was employed in more than six of the seven emissions units P003, P004, P005, P006, P007, P008, and P009. The notification shall include a copy of such record and shall be sent to the Ohio EPA Southeast District Office within 30 days after the event occurs.
3. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of each day during which the daily OC emissions rate exceeded 48 lbs/day, and the actual OC emission rate for each such day;
 - b. for the first 12 calendar months of operation following the issuance of this permit, an identification of all exceedances of the maximum allowable cumulative facility-wide single HAP emissions and facility-wide combined HAPs emissions;
 - c. beginning after the first 12 calendar months of operation following the issuance of this permit, an identification of all exceedances of the rolling, 12-month facility-wide single HAP and combined HAPs limitations;
 - d. for the first 12 calendar months of operation following the issuance of this permit, an identification of all exceedances of the maximum allowable cumulative OC limitation; and
 - e. beginning after the first 12 calendar months of operation following the issuance of this permit, an identification of all exceedances of the rolling, 12-month OC limitation for emissions units P003, P004, P005, P006, P007, P008, and P009 combined.

These reports shall be submitted in accordance with Section A.2 of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

OC emissions shall not exceed 48 lbs/day.

Applicable Compliance Method:

Compliance shall be determined based on the record keeping requirements specified in Section C.1.

- b. Emission Limitation:
Emissions of any single HAP from this facility shall be less than 9.9 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on the record keeping requirements specified in Section C.2.

- c. Emission Limitation:
Emissions of any combination of HAPs from this facility shall be less than 24.9 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on the record keeping requirements specified in Section C.2.

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- d. Emission Limitation:
OC emissions from emissions units P003, P004, P005, P006, P007, P008, and P009 combined shall not exceed 14.0 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on the record keeping requirements specified in Section C.3.

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

F. Miscellaneous Requirements

None.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>	
P006 - Cleanup Area No. 4	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-07(G)
	OAC rule 3745-35-07(B)	

Applicable Emissions
Limitations/Control Measures

Organic compound (OC) emissions shall not exceed 48 pounds (lbs)/day.

See Section B.1 below.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07(B) and OAC rule 3745-21-07(G).

Emissions of any single hazardous air pollutant (HAP) from this facility shall be less than 9.9 tons as a rolling, 12-month summation.

Emissions of any combination of HAPs from this facility shall be less than 24.9 tons as a rolling, 12-month summation.

OC emissions from emissions units P003, P004, P005, P006, P007, P008, and P009 combined shall not exceed 14.0 tons as a rolling, 12-month summation.

See Sections A.2.a, B.1, B.2, and B.3 below.

Exempt. See Section A.2.b below.

2. Additional Terms and Conditions

- 2.a** For purposes of limiting facility-wide HAPs emissions, the facility is comprised of the following emissions units: P001, P002, P003, P004, P005, P006, P007, P008, P009, R101, R102, R103, R104, R105, and R106.
- 2.b** The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

B. Operational Restrictions

- For purposes of demonstrating compliance with the Ohio Air Toxics Policy, only six of the seven cleanup area emissions units identified as P003, P004, P005, P006, P007, P008, and P009 may employ isopropyl alcohol on a given day.
- The permittee has requested a federally enforceable limitation on facility-wide HAPs emissions for purposes of limiting potential to emit. Therefore, the maximum facility-wide HAPs emissions shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, based on rolling, 12-month summations. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAPs emissions specified in the following table:

<u>Month(s)</u>	<u>Maximum facility-wide single HAP emissions (tons)</u>	<u>Maximum facility-wide combined HAPs emissions (tons)</u>
1	0.9	2.1
1-2	1.8	4.2
1-3	2.7	6.3
1-4	3.6	8.4
1-5	4.5	10.5
1-6	5.4	12.6
1-7	6.3	14.7
1-8	7.2	16.8
1-9	8.1	18.9
1-10	9.0	21.0
1-11	9.9	23.1
1-12	9.9	24.9

After the first 12 calendar months of operation following issuance of this permit, compliance with the HAPs emissions limitations shall be based on rolling, 12-month summations.

3. The maximum material usage for emissions units P003, P004, P005, P006, P007, P008, and P009 combined shall not cause OC emissions to exceed 14.0 tons as a rolling, 12-month summation, calculated using the following formula:

$$14.0 \text{ tons OC} \geq \sum_{n=1}^i \frac{(P_i)(OC_i)}{2000 \text{ lbs/ton}}$$

where:

P_i = usage of cleanup material i in gallons

OC_i = Organic compound content of cleanup material i in pounds OC per gallon.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the material usage for emissions units P003, P004, P005, P006, P007, P008, and P009 combined shall not cause OC emissions to exceed the rates specified in the following table:

<u>Month(s)</u>	<u>Maximum allowable OC emissions (tons)</u>
1	1.2
1-2	2.4
1-3	3.6
1-4	4.8
1-5	6.0
1-6	7.2
1-7	8.4
1-8	9.6
1-9	10.8
1-10	12.0
1-11	13.2
1-12	14.0

After the first 12 calendar months of operation following issuance of this permit, compliance with the combined OC limitation shall be based on a rolling, 12-month summation.

C. Monitoring and/or Recordkeeping Requirements

Emissions Unit ID: **P006**

1. The permittee shall collect and record the following information each day for the cleanup operation:
 - a. the company name and identification of each cleanup material employed in this emissions unit;
 - b. whether or not each cleanup material employed is a photochemically reactive material;
 - c. the number of gallons of each cleanup material employed;
 - d. the OC content of each cleanup material employed, in pounds per gallon;
 - e. the total OC emission rate for all cleanup materials employed, in pounds (i.e., the sum of [(C.1.c) x (C.1.d)] for all cleanup materials employed); and
 - f. whether or not isopropyl alcohol was used in each of emissions units P003-P009.

2. The permittee shall collect and record the following information each month for the facility:
 - a. the name and identification number of each coating, thinner, and cleanup material employed;
 - b. the individual HAP* content for each HAP of each coating and cleanup material, in pounds of individual HAP per gallon;
 - c. the number of gallons of each coating, thinner, and cleanup material employed;
 - d. the total pounds of each individual HAP recovered in solvent waste;
 - e. the total individual HAP emissions for each HAP from all coatings, thinners, and cleanup materials, in tons per month (i.e., the sum of [(C.2.b.) x (C.2.c.) - (C.2.d)] for each individual HAP, divided by 2,000 lbs/ton);
 - f. the rolling, 12-month summation of the total individual HAP emissions from all emissions units at the facility, in tons (i.e. the sum of individual HAP emissions for the current month and the preceding eleven calendar months);
 - g. the total combined HAP emissions from all coatings, thinners, and cleanup materials, in tons per month (i.e., sum of individual HAP emissions from all coatings and cleanup materials as determined in C.2.e); and

- h. the rolling, 12-month summation of the total combined HAP emissions from all emissions units at the facility, in tons (i.e. the sum of combined HAP emissions for the current month and the preceding eleven calendar months).

*A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Southeast District Office. This information does not have to be kept on a line-by-line basis.

3. The permittee shall collect and record the following information each month for emissions units P003, P004, P005, P006, P007, P008, and P009 combined:
 - a. the total OC emissions for each month, in tons, calculated according to the formula specified in Section B.3; and
 - b. the rolling, 12-month summation of the total OC emissions, in tons (i.e., the sum of the total combined OC emissions for the current month and the preceding eleven calendar months).
4. The permit to install for this emissions unit (P006) 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. 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: Isopropyl Alcohol

TLV (mg/m³): 491.5

Maximum Hourly Emission Rate (lbs/hr): 2.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1,699

MAGLC (ug/m³): 11,702

Physical changes to or changes in the method of operation of the emissions unit after its

Emissions Unit ID: **P006**

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.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install 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 notify the Ohio EPA Southeast District Office in writing of any daily record showing that photochemically reactive materials were employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Ohio EPA Southeast District Office within 30 days after the event occurs.
2. The permittee shall notify the Ohio EPA Southeast District Office in writing of any daily record showing that isopropyl alcohol was employed in more than six of the seven emissions units P003, P004, P005, P006, P007, P008, and P009. The notification shall include a copy of such record and shall be sent to the Ohio EPA Southeast District Office within 30 days after the event occurs.
3. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of each day during which the daily OC emissions rate exceeded 48 lbs/day, and the actual OC emission rate for each such day;
 - b. for the first 12 calendar months of operation following the issuance of this permit, an identification of all exceedances of the maximum allowable cumulative facility-wide single HAP emissions and facility-wide combined HAPs emissions;
 - c. beginning after the first 12 calendar months of operation following the issuance of this permit, an identification of all exceedances of the rolling, 12-month facility-wide single HAP and combined HAPs limitations;
 - d. for the first 12 calendar months of operation following the issuance of this permit, an identification of all exceedances of the maximum allowable cumulative OC limitation; and
 - e. beginning after the first 12 calendar months of operation following the issuance of this permit, an identification of all exceedances of the rolling, 12-month OC limitation for emissions units P003, P004, P005, P006, P007, P008, and P009 combined.

These reports shall be submitted in accordance with Section A.2 of the General Terms and Conditions of this permit.

E. Testing Requirements

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

- a. Emission Limitation:
OC emissions shall not exceed 48 lbs/day.
- Applicable Compliance Method:
Compliance shall be determined based on the record keeping requirements specified in Section C.1.
- b. Emission Limitation:
Emissions of any single HAP from this facility shall be less than 9.9 tons as a rolling, 12-month summation.
- Applicable Compliance Method:
Compliance shall be determined based on the record keeping requirements specified in Section C.2.
- c. Emission Limitation:
Emissions of any combination of HAPs from this facility shall be less than 24.9 tons as a rolling, 12-month summation.
- Applicable Compliance Method:
Compliance shall be determined based on the record keeping requirements specified in Section C.2.

- d. Emission Limitation:
OC emissions from emissions units P003, P004, P005, P006, P007, P008, and P009 combined shall not exceed 14.0 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on the record keeping requirements specified in Section C.3.

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

F. Miscellaneous Requirements

None.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>	
P007 - Cleanup Area No. 5	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-07(G)
	OAC rule 3745-35-07(B)	

Applicable Emissions
Limitations/Control Measures

Organic compound (OC) emissions shall not exceed 48 pounds (lbs)/day.

See Section B.1 below.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07(B) and OAC rule 3745-21-07(G).

Emissions of any single hazardous air pollutant (HAP) from this facility shall be less than 9.9 tons as a rolling, 12-month summation.

Emissions of any combination of HAPs from this facility shall be less than 24.9 tons as a rolling, 12-month summation.

OC emissions from emissions units P003, P004, P005, P006, P007, P008, and P009 combined shall not exceed 14.0 tons as a rolling, 12-month summation.

See Sections A.2.a, B.1, B.2, and B.3 below.

Exempt. See Section A.2.b below.

2. Additional Terms and Conditions

- 2.a** For purposes of limiting facility-wide HAPs emissions, the facility is comprised of the following emissions units: P001, P002, P003, P004, P005, P006, P007, P008, P009, R101, R102, R103, R104, R105, and R106.
- 2.b** The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

B. Operational Restrictions

- For purposes of demonstrating compliance with the Ohio Air Toxics Policy, only six of the seven cleanup area emissions units identified as P003, P004, P005, P006, P007, P008, and P009 may employ isopropyl alcohol on a given day.
- The permittee has requested a federally enforceable limitation on facility-wide HAPs emissions for purposes of limiting potential to emit. Therefore, the maximum facility-wide HAPs emissions shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, based on rolling, 12-month summations. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAPs emissions specified in the following table:

<u>Month(s)</u>	<u>Maximum facility-wide single HAP emissions (tons)</u>	<u>Maximum facility-wide combined HAPs emissions (tons)</u>
1	0.9	2.1
1-2	1.8	4.2
1-3	2.7	6.3
1-4	3.6	8.4
1-5	4.5	10.5
1-6	5.4	12.6
1-7	6.3	14.7
1-8	7.2	16.8
1-9	8.1	18.9
1-10	9.0	21.0
1-11	9.9	23.1
1-12	9.9	24.9

After the first 12 calendar months of operation following issuance of this permit, compliance with the HAPs emissions limitations shall be based on rolling, 12-month summations.

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3. The maximum material usage for emissions units P003, P004, P005, P006, P007, P008, and P009 combined shall not cause OC emissions to exceed 14.0 tons as a rolling, 12-month summation, calculated using the following formula:

$$14.0 \text{ tons OC} \geq \sum_{n=1}^i \frac{(P_i)(OC_i)}{2000 \text{ lbs/ton}}$$

where:

P_i = usage of cleanup material i in gallons

OC_i = Organic compound content of cleanup material i in pounds OC per gallon.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the material usage for emissions units P003, P004, P005, P006, P007, P008, and P009 combined shall not cause OC emissions to exceed the rates specified in the following table:

<u>Month(s)</u>	<u>Maximum allowable OC emissions (tons)</u>
1	1.2
1-2	2.4
1-3	3.6
1-4	4.8
1-5	6.0
1-6	7.2
1-7	8.4
1-8	9.6
1-9	10.8
1-10	12.0
1-11	13.2
1-12	14.0

After the first 12 calendar months of operation following issuance of this permit, compliance with the combined OC limitation shall be based on a rolling, 12-month summation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the cleanup operation:

- a. the company name and identification of each cleanup material employed in this emissions unit;
 - b. whether or not each cleanup material employed is a photochemically reactive material;
 - c. the number of gallons of each cleanup material employed;
 - d. the OC content of each cleanup material employed, in pounds per gallon;
 - e. the total OC emission rate for all cleanup materials employed, in pounds (i.e., the sum of [(C.1.c) x (C.1.d)] for all cleanup materials employed); and
 - f. whether or not isopropyl alcohol was used in each of emissions units P003-P009.
2. The permittee shall collect and record the following information each month for the facility:
- a. the name and identification number of each coating, thinner, and cleanup material employed;
 - b. the individual HAP* content for each HAP of each coating and cleanup material, in pounds of individual HAP per gallon;
 - c. the number of gallons of each coating, thinner, and cleanup material employed;
 - d. the total pounds of each individual HAP recovered in solvent waste;
 - e. the total individual HAP emissions for each HAP from all coatings, thinners, and cleanup materials, in tons per month (i.e., the sum of [(C.2.b.) x (C.2.c.) - (C.2.d)] for each individual HAP, divided by 2,000 lbs/ton);
 - f. the rolling, 12-month summation of the total individual HAP emissions from all emissions units at the facility, in tons (i.e. the sum of individual HAP emissions for the current month and the preceding eleven calendar months);
 - g. the total combined HAP emissions from all coatings, thinners, and cleanup materials, in tons per month (i.e., sum of individual HAP emissions from all coatings and cleanup materials as determined in C.2.e); and

- h. the rolling, 12-month summation of the total combined HAP emissions from all emissions units at the facility, in tons (i.e. the sum of combined HAP emissions for the current month and the preceding eleven calendar months).

*A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Southeast District Office. This information does not have to be kept on a line-by-line basis.

3. The permittee shall collect and record the following information each month for emissions units P003, P004, P005, P006, P007, P008, and P009 combined:
 - a. the total OC emissions for each month, in tons, calculated according to the formula specified in Section B.3; and
 - b. the rolling, 12-month summation of the total OC emissions, in tons (i.e., the sum of the total combined OC emissions for the current month and the preceding eleven calendar months).
4. The permit to install for this emissions unit (P007) 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. 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: Isopropyl Alcohol

TLV (mg/m³): 491.5

Maximum Hourly Emission Rate (lbs/hr): 2.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1,699

MAGLC (ug/m³): 11,702

Physical changes to or changes in the method of operation of the emissions unit after its

Emissions Unit ID: **P007**

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.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install 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 notify the Ohio EPA Southeast District Office in writing of any daily record showing that photochemically reactive materials were employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Ohio EPA Southeast District Office within 30 days after the event occurs.
2. The permittee shall notify the Ohio EPA Southeast District Office in writing of any daily record showing that isopropyl alcohol was employed in more than six of the seven emissions units P003, P004, P005, P006, P007, P008, and P009. The notification shall include a copy of such record and shall be sent to the Ohio EPA Southeast District Office within 30 days after the event occurs.
3. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of each day during which the daily OC emissions rate exceeded 48 lbs/day, and the actual OC emission rate for each such day;
 - b. for the first 12 calendar months of operation following the issuance of this permit, an identification of all exceedances of the maximum allowable cumulative facility-wide single HAP emissions and facility-wide combined HAPs emissions;
 - c. beginning after the first 12 calendar months of operation following the issuance of this permit, an identification of all exceedances of the rolling, 12-month facility-wide single HAP and combined HAPs limitations;
 - d. for the first 12 calendar months of operation following the issuance of this permit, an identification of all exceedances of the maximum allowable cumulative OC limitation; and
 - e. beginning after the first 12 calendar months of operation following the issuance of this permit, an identification of all exceedances of the rolling, 12-month OC limitation for emissions units P003, P004, P005, P006, P007, P008, and P009 combined.

These reports shall be submitted in accordance with Section A.2 of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

OC emissions shall not exceed 48 lbs/day.

Applicable Compliance Method:

Compliance shall be determined based on the record keeping requirements specified in Section C.1.

- b. Emission Limitation:
Emissions of any single HAP from this facility shall be less than 9.9 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on the record keeping requirements specified in Section C.2.

- c. Emission Limitation:
Emissions of any combination of HAPs from this facility shall be less than 24.9 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on the record keeping requirements specified in Section C.2.

- d. Emission Limitation:
OC emissions from emissions units P003, P004, P005, P006, P007, P008, and P009 combined shall not exceed 14.0 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Compliance shall be determined based on the record keeping requirements specified in Section C.3.

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

F. Miscellaneous Requirements

None.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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.

Operations, Property, and/or Equipment	<u>Applicable Rules/Requirements</u>	
P008 - Cleanup Area No. 6	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-07(G)
	OAC rule 3745-35-07(B)	

Applicable Emissions
Limitations/Control Measures

Organic compound (OC) emissions shall not exceed 48 pounds (lbs)/day.

See Section B.1 below.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07(B) and OAC rule 3745-21-07(G).

Emissions of any single hazardous air pollutant (HAP) from this facility shall be less than 9.9 tons as a rolling, 12-month summation.

Emissions of any combination of HAPs from this facility shall be less than 24.9 tons as a rolling, 12-month summation.

OC emissions from emissions units P003, P004, P005, P006, P007, P008, and P009 combined shall not exceed 14.0 tons as a rolling, 12-month summation.

See Sections A.2.a, B.1, B.2, and B.3 below.

Exempt. See Section A.2.b below.

2. Additional Terms and Conditions

- 2.a** For purposes of limiting facility-wide HAPs emissions, the facility is comprised of the following emissions units: P001, P002, P003, P004, P005, P006, P007, P008, P009,

R101, R102, R103, R104, R105, and R106.

- 2.b** The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

B. Operational Restrictions

1. For purposes of demonstrating compliance with the Ohio Air Toxics Policy, only six of the seven cleanup area emissions units identified as P003, P004, P005, P006, P007, P008, and P009 may employ isopropyl alcohol on a given day.
2. The permittee has requested a federally enforceable limitation on facility-wide HAPs emissions for purposes of limiting potential to emit. Therefore, the maximum facility-wide HAPs emissions shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, based on rolling, 12-month summations. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAPs emissions specified in the following table:

<u>Month(s)</u>	<u>Maximum facility-wide single HAP emissions (tons)</u>	<u>Maximum facility-wide combined HAPs emissions (tons)</u>
1	0.9	2.1
1-2	1.8	4.2
1-3	2.7	6.3
1-4	3.6	8.4
1-5	4.5	10.5
1-6	5.4	12.6
1-7	6.3	14.7
1-8	7.2	16.8
1-9	8.1	18.9
1-10	9.0	21.0
1-11	9.9	23.1
1-12	9.9	24.9

After the first 12 calendar months of operation following issuance of this permit, compliance with the HAPs emissions limitations shall be based on rolling, 12-month summations.

3. The maximum material usage for emissions units P003, P004, P005, P006, P007, P008, and P009 combined shall not cause OC emissions to exceed 14.0 tons as a rolling, 12-month summation,

calculated using the following formula:

$$14.0 \text{ tons OC} \geq \sum_{n=1}^i \frac{(P_i)(OC_i)}{2000 \text{ lbs/ton}}$$

where:

P_i = usage of cleanup material i in gallons

OC_i = Organic compound content of cleanup material i in pounds OC per gallon.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the material usage for emissions units P003, P004, P005, P006, P007, P008, and P009 combined shall not cause OC emissions to exceed the rates specified in the following table:

<u>Month(s)</u>	<u>Maximum allowable OC emissions (tons)</u>
1	1.2
1-2	2.4
1-3	3.6
1-4	4.8
1-5	6.0
1-6	7.2
1-7	8.4
1-8	9.6
1-9	10.8
1-10	12.0
1-11	13.2
1-12	14.0

After the first 12 calendar months of operation following issuance of this permit, compliance with the combined OC limitation shall be based on a rolling, 12-month summation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the cleanup operation:

- a. the company name and identification of each cleanup material employed in this emissions unit;
 - b. whether or not each cleanup material employed is a photochemically reactive material;
 - c. the number of gallons of each cleanup material employed;
 - d. the OC content of each cleanup material employed, in pounds per gallon;
 - e. the total OC emission rate for all cleanup materials employed, in pounds (i.e., the sum of [(C.1.c) x (C.1.d)] for all cleanup materials employed); and
 - f. whether or not isopropyl alcohol was used in each of emissions units P003-P009.
2. The permittee shall collect and record the following information each month for the facility:
- a. the name and identification number of each coating, thinner, and cleanup material employed;
 - b. the individual HAP* content for each HAP of each coating and cleanup material, in pounds of individual HAP per gallon;
 - c. the number of gallons of each coating, thinner, and cleanup material employed;
 - d. the total pounds of each individual HAP recovered in solvent waste;
 - e. the total individual HAP emissions for each HAP from all coatings, thinners, and cleanup materials, in tons per month (i.e., the sum of [(C.2.b.) x (C.2.c.) - (C.2.d)] for each individual HAP, divided by 2,000 lbs/ton);
 - f. the rolling, 12-month summation of the total individual HAP emissions from all emissions units at the facility, in tons (i.e. the sum of individual HAP emissions for the current month and the preceding eleven calendar months);
 - g. the total combined HAP emissions from all coatings, thinners, and cleanup materials, in tons per month (i.e., sum of individual HAP emissions from all coatings and cleanup materials as determined in C.2.e); and

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- h. the rolling, 12-month summation of the total combined HAP emissions from all emissions units at the facility, in tons (i.e. the sum of combined HAP emissions for the current month and the preceding eleven calendar months).

*A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Southeast District Office. This information does not have to be kept on a line-by-line basis.

3. The permittee shall collect and record the following information each month for emissions units P003, P004, P005, P006, P007, P008, and P009 combined:
- a. the total OC emissions for each month, in tons, calculated according to the formula specified in Section B.3; and
- b. the rolling, 12-month summation of the total OC emissions, in tons (i.e., the sum of the total combined OC emissions for the current month and the preceding eleven calendar months).
4. The permit to install for this emissions unit (P008) 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. 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: Isopropyl Alcohol

TLV (mg/m³): 491.5

Maximum Hourly Emission Rate (lbs/hr): 2.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1,699

MAGLC (ug/m³): 11,702

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.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install 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 notify the Ohio EPA Southeast District Office in writing of any daily record showing that photochemically reactive materials were employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Ohio EPA Southeast District Office within 30 days after the event occurs.
2. The permittee shall notify the Ohio EPA Southeast District Office in writing of any daily record showing that isopropyl alcohol was employed in more than six of the seven emissions units P003, P004, P005, P006, P007, P008, and P009. The notification shall include a copy of such record and shall be sent to the Ohio EPA Southeast District Office within 30 days after the event occurs.
3. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of each day during which the daily OC emissions rate exceeded 48 lbs/day, and the actual OC emission rate for each such day;
 - b. for the first 12 calendar months of operation following the issuance of this permit, an identification of all exceedances of the maximum allowable cumulative facility-wide single HAP emissions and facility-wide combined HAPs emissions;
 - c. beginning after the first 12 calendar months of operation following the issuance of this permit, an identification of all exceedances of the rolling, 12-month facility-wide single HAP and combined HAPs limitations;
 - d. for the first 12 calendar months of operation following the issuance of this permit, an identification of all exceedances of the maximum allowable cumulative OC limitation; and
 - e. beginning after the first 12 calendar months of operation following the issuance of this permit, an identification of all exceedances of the rolling, 12-month OC limitation for emissions units P003, P004, P005, P006, P007, P008, and P009 combined.

These reports shall be submitted in accordance with Section A.2 of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

OC emissions shall not exceed 48 lbs/day.

Applicable Compliance Method:

Compliance shall be determined based on the record keeping requirements specified in Section C.1.

- b. Emission Limitation:
Emissions of any single HAP from this facility shall be less than 9.9 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on the record keeping requirements specified in Section C.2.

- c. Emission Limitation:
Emissions of any combination of HAPs from this facility shall be less than 24.9 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on the record keeping requirements specified in Section C.2.

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- d. Emission Limitation:
OC emissions from emissions units P003, P004, P005, P006, P007, P008, and P009 combined shall not exceed 14.0 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on the record keeping requirements specified in Section C.3.

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

F. Miscellaneous Requirements

None.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>	
P009 - Cleanup Area No. 7	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-07(G)
	OAC rule 3745-35-07(B)	

Applicable Emissions
Limitations/Control Measures

Organic compound (OC) emissions shall not exceed 48 pounds (lbs)/day.

See Section B.1 below.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07(B) and OAC rule 3745-21-07(G).

Emissions of any single hazardous air pollutant (HAP) from this facility shall be less than 9.9 tons as a rolling, 12-month summation.

Emissions of any combination of HAPs from this facility shall be less than 24.9 tons as a rolling, 12-month summation.

OC emissions from emissions units P003, P004, P005, P006, P007, P008, and P009 combined shall not exceed 14.0 tons as a rolling, 12-month summation.

See Sections A.2.a, B.1, B.2, and B.3 below.

Exempt. See Section A.2.b below.

2. Additional Terms and Conditions

- 2.a** For purposes of limiting facility-wide HAPs emissions, the facility is comprised of the following emissions units: P001, P002, P003, P004, P005, P006, P007, P008, P009, R101, R102, R103, R104, R105, and R106.
- 2.b** The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

B. Operational Restrictions

- For purposes of demonstrating compliance with the Ohio Air Toxics Policy, only six of the seven cleanup area emissions units identified as P003, P004, P005, P006, P007, P008, and P009 may employ isopropyl alcohol on a given day.
- The permittee has requested a federally enforceable limitation on facility-wide HAPs emissions for purposes of limiting potential to emit. Therefore, the maximum facility-wide HAPs emissions shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, based on rolling, 12-month summations. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAPs emissions specified in the following table:

<u>Month(s)</u>	<u>Maximum facility-wide single HAP emissions (tons)</u>	<u>Maximum facility-wide combined HAPs emissions (tons)</u>
1	0.9	2.1
1-2	1.8	4.2
1-3	2.7	6.3
1-4	3.6	8.4
1-5	4.5	10.5
1-6	5.4	12.6
1-7	6.3	14.7
1-8	7.2	16.8
1-9	8.1	18.9
1-10	9.0	21.0
1-11	9.9	23.1
1-12	9.9	24.9

After the first 12 calendar months of operation following issuance of this permit, compliance with the HAPs emissions limitations shall be based on rolling, 12-month summations.

3. The maximum material usage for emissions units P003, P004, P005, P006, P007, P008, and P009 combined shall not cause OC emissions to exceed 14.0 tons as a rolling, 12-month summation, calculated using the following formula:

$$14.0 \text{ tons OC} \geq \sum_{n=1}^i \frac{(P_i)(OC_i)}{2000 \text{ lbs/ton}}$$

where:

P_i = usage of cleanup material i in gallons

OC_i = Organic compound content of cleanup material i in pounds OC per gallon.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the material usage for emissions units P003, P004, P005, P006, P007, P008, and P009 combined shall not cause OC emissions to exceed the rates specified in the following table:

<u>Month(s)</u>	<u>Maximum allowable OC emissions (tons)</u>
1	1.2
1-2	2.4
1-3	3.6
1-4	4.8
1-5	6.0
1-6	7.2
1-7	8.4
1-8	9.6
1-9	10.8
1-10	12.0
1-11	13.2
1-12	14.0

After the first 12 calendar months of operation following issuance of this permit, compliance with the combined OC limitation shall be based on a rolling, 12-month summation.

C. Monitoring and/or Recordkeeping Requirements

Emissions Unit ID: **P009**

1. The permittee shall collect and record the following information each day for the cleanup operation:
 - a. the company name and identification of each cleanup material employed in this emissions unit;
 - b. whether or not each cleanup material employed is a photochemically reactive material;
 - c. the number of gallons of each cleanup material employed;
 - d. the OC content of each cleanup material employed, in pounds per gallon;
 - e. the total OC emission rate for all cleanup materials employed, in pounds (i.e., the sum of [(C.1.c) x (C.1.d)] for all cleanup materials employed); and
 - f. whether or not isopropyl alcohol was used in each of emissions units P003-P009.

2. The permittee shall collect and record the following information each month for the facility:
 - a. the name and identification number of each coating, thinner, and cleanup material employed;
 - b. the individual HAP* content for each HAP of each coating and cleanup material, in pounds of individual HAP per gallon;
 - c. the number of gallons of each coating, thinner, and cleanup material employed;
 - d. the total pounds of each individual HAP recovered in solvent waste;
 - e. the total individual HAP emissions for each HAP from all coatings, thinners, and cleanup materials, in tons per month (i.e., the sum of [(C.2.b.) x (C.2.c.) - (C.2.d)] for each individual HAP, divided by 2,000 lbs/ton);
 - f. the rolling, 12-month summation of the total individual HAP emissions from all emissions units at the facility, in tons (i.e. the sum of individual HAP emissions for the current month and the preceding eleven calendar months);
 - g. the total combined HAP emissions from all coatings, thinners, and cleanup materials, in tons per month (i.e., sum of individual HAP emissions from all coatings and cleanup materials as determined in C.2.e); and

- h. the rolling, 12-month summation of the total combined HAP emissions from all emissions units at the facility, in tons (i.e. the sum of combined HAP emissions for the current month and the preceding eleven calendar months).

*A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Southeast District Office. This information does not have to be kept on a line-by-line basis.

- 3. The permittee shall collect and record the following information each month for emissions units P003, P004, P005, P006, P007, P008, and P009 combined:
 - a. the total OC emissions for each month, in tons, calculated according to the formula specified in Section B.3; and
 - b. the rolling, 12-month summation of the total OC emissions, in tons (i.e., the sum of the total combined OC emissions for the current month and the preceding eleven calendar months).
- 4. The permit to install for this emissions unit (P009) 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. 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: Isopropyl Alcohol

TLV (mg/m³): 491.5

Maximum Hourly Emission Rate (lbs/hr): 2.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1,699

MAGLC (ug/m³): 11,702

Physical changes to or changes in the method of operation of the emissions unit after its

Emissions Unit ID: **P009**

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.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install 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 notify the Ohio EPA Southeast District Office in writing of any daily record showing that photochemically reactive materials were employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Ohio EPA Southeast District Office within 30 days after the event occurs.
2. The permittee shall notify the Ohio EPA Southeast District Office in writing of any daily record showing that isopropyl alcohol was employed in more than six of the seven emissions units P003, P004, P005, P006, P007, P008, and P009. The notification shall include a copy of such record and shall be sent to the Ohio EPA Southeast District Office within 30 days after the event occurs.
3. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of each day during which the daily OC emissions rate exceeded 48 lbs/day, and the actual OC emission rate for each such day;
 - b. for the first 12 calendar months of operation following the issuance of this permit, an identification of all exceedances of the maximum allowable cumulative facility-wide single HAP emissions and facility-wide combined HAPs emissions;
 - c. beginning after the first 12 calendar months of operation following the issuance of this permit, an identification of all exceedances of the rolling, 12-month facility-wide single HAP and combined HAPs limitations;
 - d. for the first 12 calendar months of operation following the issuance of this permit, an identification of all exceedances of the maximum allowable cumulative OC limitation; and
 - e. beginning after the first 12 calendar months of operation following the issuance of this permit, an identification of all exceedances of the rolling, 12-month OC limitation for emissions units P003, P004, P005, P006, P007, P008, and P009 combined.

These reports shall be submitted in accordance with Section A.2 of the General Terms and Conditions of this permit.

E. Testing Requirements

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

- a. **Emission Limitation:**
OC emissions shall not exceed 48 lbs/day.
- Applicable Compliance Method:**
Compliance shall be determined based on the record keeping requirements specified in Section C.1.
- b. **Emission Limitation:**
Emissions of any single HAP from this facility shall be less than 9.9 tons as a rolling, 12-month summation.
- Applicable Compliance Method:**
Compliance shall be determined based on the record keeping requirements specified in Section C.2.
- c. **Emission Limitation:**
Emissions of any combination of HAPs from this facility shall be less than 24.9 tons as a rolling, 12-month summation.
- Applicable Compliance Method:**
Compliance shall be determined based on the record keeping requirements specified in Section C.2.

- d. Emission Limitation:
OC emissions from emissions units P003, P004, P005, P006, P007, P008, and P009 combined shall not exceed 14.0 tons as a rolling, 12-month summation.

Applicable Compliance Method:
Compliance shall be determined based on the record keeping requirements specified in Section C.3.

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

F. Miscellaneous Requirements

None.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
R101 - Spray Booth A	OAC rule 3745-31-05(A)(3)
Chapter 31 modification of PTI 06-05329, issued 7/29/98, to increase allowable OC emissions, See Section F.1.	OAC rule 3745-21-07(G)(2)
	OAC rule 3745-17-07(A)
	OAC rule 3745-35-07(B)
	OAC rule 3745-17-11(B)(1)

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Applicable Emissions
Limitations/Control Measures

Organic compound (OC) emissions shall not exceed 8 pounds (lbs)/hr, including cleanup materials, on any day in which no photochemically reactive material (coating or cleanup material) is employed in this emissions unit.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-35-07(B), 3745-21-07(G)(2), 3745-17-07(A) and 3745-17-11(B)(1).

Emissions of any single hazardous air pollutant (HAP) from this facility shall be less than 9.9 tons as a rolling, 12-month summation.

Emissions of any combination of HAPs from this facility shall be less than 24.9 tons as a rolling, 12-month summation.

See Sections A.2.a and B.1 below.

OC emissions from emissions units R101, R102, R103, R104, R105, and R106 combined shall not exceed 51.1 tons as a rolling, 12-month summation.

See Section B.2 below.

OC emissions shall not exceed 8 lbs/hr and 40 lbs/day on any day in which a photochemically reactive material (coating or cleanup material) is employed in this emissions unit.

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Particulate emissions shall not exceed 2.58 lbs/hr.

2. Additional Terms and Conditions

- 2.a** For purposes of limiting facility-wide HAPs emissions, the facility is comprised of the following emissions units: P001, P002, P003, P004, P005, P006, P007, P008, P009, R101, R102, R103, R104, R105, and R106.
- 2.b** The permittee shall employ a spray booth filter having a design control efficiency for particulates greater than 98% during any time the emissions unit is in operation.

B. Operational Restrictions

1. The permittee has requested a federally enforceable limitation on facility-wide HAPs emissions for purposes of limiting potential to emit. Therefore, the maximum facility-wide HAPs emissions shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, based on rolling, 12-month summations. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAPs emissions specified in the following table:

<u>Month(s)</u>	<u>Maximum facility-wide single HAP emissions (tons)</u>	<u>Maximum facility-wide combined HAPs emissions (tons)</u>
1	0.9	2.1
1-2	1.8	4.2
1-3	2.7	6.3
1-4	3.6	8.4
1-5	4.5	10.5
1-6	5.4	12.6
1-7	6.3	14.7
1-8	7.2	16.8
1-9	8.1	18.9
1-10	9.0	21.0
1-11	9.9	23.1
1-12	9.9	24.9

After the first 12 calendar months of operation following issuance of this permit, compliance with the HAPs emissions limitations shall be based on rolling, 12-month summations.

2. The maximum material usage for emissions units R101, R102, R103, R104, R105, and R106 combined shall not cause OC emissions to exceed 51.1 tons as a rolling, 12-month summation, calculated using the following formula:

$$51.1 \text{ tons OC} \geq \sum_{n=1}^i \frac{(P_i)(OC_i)}{2000 \text{ lbs/ton}} + \frac{(S_j)(OC_j)}{2000 \text{ lbs/ton}}$$

where:

P_i = usage of coating i in gallons

OC_i = Organic compound content of coating i in pounds OC per gallon.

S_j = usage of cleanup material j in gallons

OC_j = Organic compound content of cleanup material j in pounds OC per gallon.

The permittee has sufficient existing records to demonstrate compliance with this limitation during the first twelve months after issuance of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the coating operation:
 - a. the company identification for each coating and cleanup material employed;
 - b. documentation on whether or not each coating and cleanup material is a photochemically reactive material;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the OC content of each coating and cleanup material, in pounds per gallon;
 - e. the total number of hours the emissions unit was in operation;
 - f. the total daily OC emission rate for all coatings, in pounds per day;
 - g. the total daily OC emission rate for all photochemically reactive cleanup materials, in pounds per day;
 - h. the total daily OC emission rate for all non-photochemically reactive cleanup materials, in pounds per day;
 - i. for each day during which a photochemically reactive material (coating or cleanup

material) is employed, the total OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., [(f) + (g)], in pounds per day;

- j. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., [(i)/(e)], in pounds per hour (average);
- k. for each day during which a photochemically reactive material is not employed, the total OC emission rate for all coatings and cleanup materials, i.e., [(f) + (g) + (h)], in pounds per day; and
- l. for each day during which a photochemically reactive material is not employed, the average hourly OC emission rate for all coatings and cleanup materials, i.e., [(k)/(e)], in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

2. The permittee shall collect and record the following information each month for the facility:
 - a. the name and identification number of each coating, thinner, and cleanup material employed;
 - b. the individual HAP* content for each HAP of each coating and cleanup material, in pounds of individual HAP per gallon;
 - c. the number of gallons of each coating, thinner, and cleanup material employed;
 - d. the total pounds of each individual HAP recovered in solvent waste;
 - e. the total individual HAP emissions for each HAP from all coatings, thinners, and cleanup materials, in tons per month (i.e., the sum of [(C.2.b.) x (C.2.c.) - (C.2.d)] for each individual HAP, divided by 2,000 lbs/ton);
 - f. the rolling, 12-month summation of the total individual HAP emissions from all emissions units at the facility, in tons (i.e. the sum of individual HAP emissions for the current month and the preceding eleven calendar months);

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- g. the total combined HAP emissions from all coatings, thinners, and cleanup materials, in tons per month (i.e., sum of individual HAP emissions from all coatings and cleanup materials as determined in C.2.e); and
- h. the rolling, 12-month summation of the total combined HAP emissions from all emissions units at the facility, in tons (i.e. the sum of combined HAP emissions for the current month and the preceding eleven calendar months).

*A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Southeast District Office. This information does not have to be kept on a line-by-line basis.

- 3. The permittee shall collect and record the following information each month for emissions units R101, R102, R103, R104, R105, and R106 combined:
 - a. the total OC emissions for each month, in tons, calculated according to the formula specified in Section B.2; and
 - b. the rolling, 12-month summation of the total OC emissions, in tons (i.e., the sum of the total combined OC emissions for the current month and the preceding eleven calendar months).
- 4. The permittee shall maintain daily records that document any time periods when the spray booth filter was not in service when the emissions unit was in operation.
- 5. The permit to install for this emissions unit (R101) 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. 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: Methyl Ethyl Ketone (MEK)

TLV (mg/m³): 589,780

Maximum Hourly Emission Rate (lbs/hr): 3.81

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 802

MAGLC (ug/m3): 14,042

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 (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.).

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

6. 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.);

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- 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 notify the Ohio EPA Southeast District Office in writing of any daily record showing that the spray booth filter was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Ohio EPA Southeast District Office within 30 days after the event occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. for the days during which no photochemically reactive materials were employed, an identification of each day during which the average hourly OC emissions from the coatings and cleanup materials exceeded 8 lbs/hr, and the actual average hourly OC emissions for each such day;
 - b. for the days during which photochemically reactive materials were employed, an identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 lbs/hr, and the actual average hourly OC emissions for each such day;
 - c. for the days during which photochemically reactive materials were employed, an identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 lbs/day, and the actual OC emissions for each such day;
 - d. for the first 12 calendar months of operation following the issuance of this permit, an identification of all exceedances of the maximum allowable cumulative facility-wide single HAP emissions and facility-wide combined HAPs emissions;
 - e. beginning after the first 12 calendar months of operation following the issuance of this permit, an identification of all exceedances of the rolling, 12-month facility-wide single HAP and combined HAPs limitations; and
 - f. an identification of all exceedances of the rolling, 12-month OC limitation for emissions units R101, R102, R103, R104, R105, and R106 combined.

These reports shall be submitted in accordance with Section A.2 of the General Terms and Conditions of this permit.

E. Testing Requirements

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

- a. Emission Limitation:
OC emissions shall not exceed 8 lbs/hr, including cleanup materials, on any day in which no photochemically reactive material (coating or cleanup material) is employed in this emissions unit.

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements specified in Section C.1.

- b. Emission Limitation:
Emissions of any single HAP from this facility shall be less than 9.9 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on the record keeping requirements specified in Section C.2.

- c. Emission Limitation:
Emissions of any combination of HAPs from this facility shall be less than 24.9 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on the record keeping requirements specified in Section C.2.

- d. Emission Limitation:
OC emissions from emissions units R101, R102, R103, R104, R105, and R106 combined shall not exceed 51.1 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on the record keeping requirements specified in Section C.3.

- e. Emission Limitation:

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OC emissions shall not exceed 8 lbs/hr and 40 lbs/day on any day in which a photochemically reactive material (coating or cleanup material) is employed in this emissions unit.

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements specified in Section C.1.

- f. Emission Limitation:
Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A. No visible emissions testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

- g. Emission Limitation: Particulate emissions shall not exceed 2.58 lbs/hr.

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation shall be used:

$$E = (M) * (1-TE) * (1-CE)$$

where:

E = particulate emission rate (lbs/hr)

M = maximum coating solids usage rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment - If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

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

F. Miscellaneous Requirements

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Emissions Unit ID: **R101**

1. This emissions unit was previously identified as emissions unit R005, Spray Booth #1.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
R102 - Spray Booth B	OAC rule 3745-31-05(A)(3)
Chapter 31 modification of PTI 06-05329, issued 7/29/98, to increase allowable OC emissions, See Section F.1.	OAC rule 3745-21-07(G)(2)
	OAC rule 3745-17-07(A)
	OAC rule 3745-35-07(B)
	OAC rule 3745-17-11(B)(1)

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Applicable Emissions
Limitations/Control Measures

Organic compound (OC) emissions shall not exceed 8 pounds (lbs)/hr, including cleanup materials, on any day in which no photochemically reactive material (coating or cleanup material) is employed in this emissions unit.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-35-07(B), 3745-21-07(G)(2), 3745-17-07(A) and 3745-17-11(B)(1).

Emissions of any single hazardous air pollutant (HAP) from this facility shall be less than 9.9 tons as a rolling, 12-month summation.

Emissions of any combination of HAPs from this facility shall be less than 24.9 tons as a rolling, 12-month summation.

See Sections A.2.a and B.1 below.

OC emissions from emissions units R101, R102, R103, R104, R105, and R106 combined shall not exceed 51.1 tons as a rolling, 12-month summation.

See Section B.2 below.

OC emissions shall not exceed 8 lbs/hr and 40 lbs/day on any day in which a photochemically reactive material (coating or cleanup material) is employed in this emissions unit.

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Particulate emissions shall not exceed 2.58 lbs/hr.

2. Additional Terms and Conditions

- 2.a** For purposes of limiting facility-wide HAPs emissions, the facility is comprised of the following emissions units: P001, P002, P003, P004, P005, P006, P007, P008, P009, R101, R102, R103, R104, R105, and R106.
- 2.b** The permittee shall employ a spray booth filter having a design control efficiency for particulates greater than 98% during any time the emissions unit is in operation.

B. Operational Restrictions

1. The permittee has requested a federally enforceable limitation on facility-wide HAPs emissions for purposes of limiting potential to emit. Therefore, the maximum facility-wide HAPs emissions shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, based on rolling, 12-month summations. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAPs emissions specified in the following table:

<u>Month(s)</u>	<u>Maximum facility-wide single HAP emissions (tons)</u>	<u>Maximum facility-wide combined HAPs emissions (tons)</u>
1	0.9	2.1
1-2	1.8	4.2
1-3	2.7	6.3
1-4	3.6	8.4
1-5	4.5	10.5
1-6	5.4	12.6
1-7	6.3	14.7
1-8	7.2	16.8
1-9	8.1	18.9
1-10	9.0	21.0
1-11	9.9	23.1
1-12	9.9	24.9

After the first 12 calendar months of operation following issuance of this permit, compliance with the HAPs emissions limitations shall be based on rolling, 12-month summations.

2. The maximum material usage for emissions units R101, R102, R103, R104, R105, and R106 combined shall not cause OC emissions to exceed 51.1 tons as a rolling, 12-month summation, calculated using the following formula:

$$51.1 \text{ tons OC} \geq \sum_{n=1}^i \frac{(P_i)(OC_i)}{2000 \text{ lbs/ton}} + \frac{(S_j)(OC_j)}{2000 \text{ lbs/ton}}$$

where:

P_i = usage of coating i in gallons

OC_i = Organic compound content of coating i in pounds OC per gallon.

S_j = usage of cleanup material j in gallons

OC_j = Organic compound content of cleanup material j in pounds OC per gallon.

The permittee has sufficient existing records to demonstrate compliance with this limitation during the first twelve months after issuance of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the coating operation:
 - a. the company identification for each coating and cleanup material employed;
 - b. documentation on whether or not each coating and cleanup material is a photochemically reactive material;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the OC content of each coating and cleanup material, in pounds per gallon;
 - e. the total number of hours the emissions unit was in operation;
 - f. the total daily OC emission rate for all coatings, in pounds per day;
 - g. the total daily OC emission rate for all photochemically reactive cleanup materials, in pounds per day;
 - h. the total daily OC emission rate for all non-photochemically reactive cleanup materials, in pounds per day;
 - i. for each day during which a photochemically reactive material (coating or cleanup

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material) is employed, the total OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., [(f) + (g)], in pounds per day;

- j. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., [(i)/(e)], in pounds per hour (average);
- k. for each day during which a photochemically reactive material is not employed, the total OC emission rate for all coatings and cleanup materials, i.e., [(f) + (g) + (h)], in pounds per day; and
- l. for each day during which a photochemically reactive material is not employed, the average hourly OC emission rate for all coatings and cleanup materials, i.e., [(k)/(e)], in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

- 2. The permittee shall collect and record the following information each month for the facility:
 - a. the name and identification number of each coating, thinner, and cleanup material employed;
 - b. the individual HAP* content for each HAP of each coating and cleanup material, in pounds of individual HAP per gallon;
 - c. the number of gallons of each coating, thinner, and cleanup material employed;
 - d. the total pounds of each individual HAP recovered in solvent waste;
 - e. the total individual HAP emissions for each HAP from all coatings, thinners, and cleanup materials, in tons per month (i.e., the sum of [(C.2.b.) x (C.2.c.) - (C.2.d.)] for each individual HAP, divided by 2,000 lbs/ton);
 - f. the rolling, 12-month summation of the total individual HAP emissions from all emissions units at the facility, in tons (i.e. the sum of individual HAP emissions for the current month and the preceding eleven calendar months);
 - g. the total combined HAP emissions from all coatings, thinners, and cleanup materials, in tons per month (i.e., sum of individual HAP emissions from all coatings and cleanup

materials as determined in C.2.e); and

- h. the rolling, 12-month summation of the total combined HAP emissions from all emissions units at the facility, in tons (i.e. the sum of combined HAP emissions for the current month and the preceding eleven calendar months).

*A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Southeast District Office. This information does not have to be kept on a line-by-line basis.

3. The permittee shall collect and record the following information each month for emissions units R101, R102, R103, R104, R105, and R106 combined:
 - a. the total OC emissions for each month, in tons, calculated according to the formula specified in Section B.2; and
 - b. the rolling, 12-month summation of the total OC emissions, in tons (i.e., the sum of the total combined OC emissions for the current month and the preceding eleven calendar months).
4. The permittee shall maintain daily records that document any time periods when the spray booth filter was not in service when the emissions unit was in operation.
5. The permit to install for this emissions unit (R102) 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. 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: Methyl Ethyl Ketone (MEK)

TLV (mg/m³): 589,780

Maximum Hourly Emission Rate (lbs/hr): 3.81

Emissions Unit ID: **R102**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 802

MAGLC (ug/m3): 14,042

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 (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.).

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

6. 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 notify the Ohio EPA Southeast District Office in writing of any daily record showing that the spray booth filter was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Ohio EPA Southeast District Office within 30 days after the event occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. for the days during which no photochemically reactive materials were employed, an identification of each day during which the average hourly OC emissions from the coatings and cleanup materials exceeded 8 lbs/hr, and the actual average hourly OC emissions for each such day;
 - b. for the days during which photochemically reactive materials were employed, an identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 lbs/hr, and the actual average hourly OC emissions for each such day;
 - c. for the days during which photochemically reactive materials were employed, an identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 lbs/day, and the actual OC emissions for each such day;
 - d. for the first 12 calendar months of operation following the issuance of this permit, an identification of all exceedances of the maximum allowable cumulative facility-wide single HAP emissions and facility-wide combined HAPs emissions;
 - e. beginning after the first 12 calendar months of operation following the issuance of this permit, an identification of all exceedances of the rolling, 12-month facility-wide single HAP and combined HAPs limitations; and
 - f. an identification of all exceedances of the rolling, 12-month OC limitation for emissions units R101, R102, R103, R104, R105, and R106 combined.

These reports shall be submitted in accordance with Section A.2 of the General Terms and Conditions of this permit.

E. Testing Requirements

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

- a. Emission Limitation:
OC emissions shall not exceed 8 lbs/hr, including cleanup materials, on any day in which no photochemically reactive material (coating or cleanup material) is employed in this emissions unit.

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements specified in Section C.1.

- b. Emission Limitation:
Emissions of any single HAP from this facility shall be less than 9.9 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on the record keeping requirements specified in Section C.2.

- c. Emission Limitation:
Emissions of any combination of HAPs from this facility shall be less than 24.9 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on the record keeping requirements specified in Section C.2.

- d. Emission Limitation:
OC emissions from emissions units R101, R102, R103, R104, R105, and R106 combined shall not exceed 51.1 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on the record keeping requirements specified in Section C.3.

- e. Emission Limitation:
OC emissions shall not exceed 8 lbs/hr and 40 lbs/day on any day in which a photochemically reactive material (coating or cleanup material) is employed in this

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Issued: 1/11/2005

Emissions Unit ID: **R102**

emissions unit.

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements specified in Section C.1.

- f. Emission Limitation:
Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A. No visible emissions testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

- g. Emission Limitation: Particulate emissions shall not exceed 2.58 lbs/hr.

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation shall be used:

$$E = (M) * (1-TE) * (1-CE)$$

where:

E = particulate emission rate (lbs/hr)

M = maximum coating solids usage rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment - If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

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

F. Miscellaneous Requirements

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The O

PTI A

Issued: 1/11/2005

Emissions Unit ID: **R102**

1. This emissions unit was previously identified as emissions unit R006, Spray Booth #2.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>	
R103 - Spray Booth C	OAC rule 3745-31-05(A)(3)	
Chapter 31 modification of PTI 06-05329, issued 7/29/98, to increase allowable OC emissions, See Section F.1.		OAC rule 3745-21-07(G)(2)
		OAC rule 3745-17-07(A)
	OAC rule 3745-35-07(B)	OAC rule 3745-17-11(B)(1)

Applicable Emissions
Limitations/Control Measures

Organic compound (OC) emissions shall not exceed 8 pounds (lbs)/hr, including cleanup materials, on any day in which no photochemically reactive material (coating or cleanup material) is employed in this emissions unit.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-35-07(B), 3745-21-07(G)(2), 3745-17-07(A) and 3745-17-11(B)(1).

Emissions of any single hazardous air pollutant (HAP) from this facility shall be less than 9.9 tons as a rolling, 12-month summation.

Emissions of any combination of HAPs from this facility shall be less than 24.9 tons as a rolling, 12-month summation.

See Sections A.2.a and B.1 below.

OC emissions from emissions units R101, R102, R103, R104, R105, and R106 combined shall not exceed 51.1 tons as a rolling, 12-month summation.

See Section B.2 below.

OC emissions shall not exceed 8 lbs/hr and 40 lbs/day on any day in

which a photochemically reactive material (coating or cleanup material) is employed in this emissions unit.

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Particulate emissions shall not exceed 2.58 lbs/hr.

2. Additional Terms and Conditions

- 2.a** For purposes of limiting facility-wide HAPs emissions, the facility is comprised of the following emissions units: P001, P002, P003, P004, P005, P006, P007, P008, P009, R101, R102, R103, R104, R105, and R106.
- 2.b** The permittee shall employ a spray booth filter having a design control efficiency for particulates greater than 98% during any time the emissions unit is in operation.

B. Operational Restrictions

1. The permittee has requested a federally enforceable limitation on facility-wide HAPs emissions for purposes of limiting potential to emit. Therefore, the maximum facility-wide HAPs emissions shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, based on rolling, 12-month summations. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAPs emissions specified in the following table:

<u>Month(s)</u>	<u>Maximum facility-wide single HAP emissions (tons)</u>	<u>Maximum facility-wide combined HAPs emissions (tons)</u>
1	0.9	2.1
1-2	1.8	4.2
1-3	2.7	6.3
1-4	3.6	8.4
1-5	4.5	10.5
1-6	5.4	12.6
1-7	6.3	14.7
1-8	7.2	16.8
1-9	8.1	18.9
1-10	9.0	21.0
1-11	9.9	23.1
1-12	9.9	24.9

After the first 12 calendar months of operation following issuance of this permit, compliance with the HAPs emissions limitations shall be based on rolling, 12-month summations.

2. The maximum material usage for emissions units R101, R102, R103, R104, R105, and R106 combined shall not cause OC emissions to exceed 51.1 tons as a rolling, 12-month summation,

calculated using the following formula:

$$51.1 \text{ tons OC} \geq \sum_{n=1}^i \frac{(P_i)(OC_i)}{2000 \text{ lbs/ton}} + \frac{(S_j)(OC_j)}{2000 \text{ lbs/ton}}$$

where:

P_i = usage of coating i in gallons

OC_i = Organic compound content of coating i in pounds OC per gallon.

S_j = usage of cleanup material j in gallons

OC_j = Organic compound content of cleanup material j in pounds OC per gallon.

The permittee has sufficient existing records to demonstrate compliance with this limitation during the first twelve months after issuance of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the coating operation:
 - a. the company identification for each coating and cleanup material employed;
 - b. documentation on whether or not each coating and cleanup material is a photochemically reactive material;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the OC content of each coating and cleanup material, in pounds per gallon;
 - e. the total number of hours the emissions unit was in operation;
 - f. the total daily OC emission rate for all coatings, in pounds per day;
 - g. the total daily OC emission rate for all photochemically reactive cleanup materials, in pounds per day;
 - h. the total daily OC emission rate for all non-photochemically reactive cleanup materials, in pounds per day;

- i. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the total OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., [(f) + (g)], in pounds per day;
- j. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., [(i)/(e)], in pounds per hour (average);
- k. for each day during which a photochemically reactive material is not employed, the total OC emission rate for all coatings and cleanup materials, i.e., [(f) + (g) + (h)], in pounds per day; and
- l. for each day during which a photochemically reactive material is not employed, the average hourly OC emission rate for all coatings and cleanup materials, i.e., [(k)/(e)], in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

2. The permittee shall collect and record the following information each month for the facility:
 - a. the name and identification number of each coating, thinner, and cleanup material employed;
 - b. the individual HAP* content for each HAP of each coating and cleanup material, in pounds of individual HAP per gallon;
 - c. the number of gallons of each coating, thinner, and cleanup material employed;
 - d. the total pounds of each individual HAP recovered in solvent waste;
 - e. the total individual HAP emissions for each HAP from all coatings, thinners, and cleanup materials, in tons per month (i.e., the sum of [(C.2.b.) x (C.2.c.) - (C.2.d)] for each individual HAP, divided by 2,000 lbs/ton);
 - f. the rolling, 12-month summation of the total individual HAP emissions from all emissions units at the facility, in tons (i.e. the sum of individual HAP emissions for the current month and the preceding eleven calendar months);

- g. the total combined HAP emissions from all coatings, thinners, and cleanup materials, in tons per month (i.e., sum of individual HAP emissions from all coatings and cleanup materials as determined in C.2.e); and
- h. the rolling, 12-month summation of the total combined HAP emissions from all emissions units at the facility, in tons (i.e. the sum of combined HAP emissions for the current month and the preceding eleven calendar months).

*A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Southeast District Office. This information does not have to be kept on a line-by-line basis.

- 3. The permittee shall collect and record the following information each month for emissions units R101, R102, R103, R104, R105, and R106 combined:
 - a. the total OC emissions for each month, in tons, calculated according to the formula specified in Section B.2; and
 - b. the rolling, 12-month summation of the total OC emissions, in tons (i.e., the sum of the total combined OC emissions for the current month and the preceding eleven calendar months).
- 4. The permittee shall maintain daily records that document any time periods when the spray booth filter was not in service when the emissions unit was in operation.
- 5. The permit to install for this emissions unit (R103) 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. 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: Methyl Ethyl Ketone (MEK)

TLV (mg/m³): 589,780

Maximum Hourly Emission Rate (lbs/hr): 3.81

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 802

MAGLC (ug/m3): 14,042

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 (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.).

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

6. 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 notify the Ohio EPA Southeast District Office in writing of any daily record showing that the spray booth filter was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Ohio EPA Southeast District Office within 30 days after the event occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. for the days during which no photochemically reactive materials were employed, an identification of each day during which the average hourly OC emissions from the coatings and cleanup materials exceeded 8 lbs/hr, and the actual average hourly OC emissions for each such day;
 - b. for the days during which photochemically reactive materials were employed, an identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 lbs/hr, and the actual average hourly OC emissions for each such day;
 - c. for the days during which photochemically reactive materials were employed, an identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 lbs/day, and the actual OC emissions for each such day;
 - d. for the first 12 calendar months of operation following the issuance of this permit, an identification of all exceedances of the maximum allowable cumulative facility-wide single HAP emissions and facility-wide combined HAPs emissions;
 - e. beginning after the first 12 calendar months of operation following the issuance of this permit, an identification of all exceedances of the rolling, 12-month facility-wide single HAP and combined HAPs limitations; and
 - f. an identification of all exceedances of the rolling, 12-month OC limitation for emissions units R101, R102, R103, R104, R105, and R106 combined.

These reports shall be submitted in accordance with Section A.2 of the General Terms and Conditions of this permit.

E. Testing Requirements

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

- a. **Emission Limitation:**
OC emissions shall not exceed 8 lbs/hr, including cleanup materials, on any day in which no photochemically reactive material (coating or cleanup material) is employed in this emissions unit.

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements specified in Section C.1.

- b. **Emission Limitation:**
Emissions of any single HAP from this facility shall be less than 9.9 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on the record keeping requirements specified in Section C.2.

- c. **Emission Limitation:**
Emissions of any combination of HAPs from this facility shall be less than 24.9 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on the record keeping requirements specified in Section C.2.

- d. **Emission Limitation:**
OC emissions from emissions units R101, R102, R103, R104, R105, and R106 combined shall not exceed 51.1 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on the record keeping requirements specified in Section C.3.

- e. **Emission Limitation:**
OC emissions shall not exceed 8 lbs/hr and 40 lbs/day on any day in which a photochemically reactive material (coating or cleanup material) is employed in this

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The O

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Emissions Unit ID: **R103**

emissions unit.

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements specified in Section C.1.

- f. Emission Limitation:
Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A. No visible emissions testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

- g. Emission Limitation: Particulate emissions shall not exceed 2.58 lbs/hr.

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation shall be used:

$$E = (M) * (1-TE) * (1-CE)$$

where:

E = particulate emission rate (lbs/hr)

M = maximum coating solids usage rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment - If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

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

F. Miscellaneous Requirements

The Ohio Plastics Company
PTI Application: 06 07530
Issued

Facility ID: 0660000023

Emissions Unit ID: **R103**

1. This emissions unit was previously identified as emissions unit R007, Spray Booth #3.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>	
R104 - Spray Booth D	OAC rule 3745-31-05(A)(3)	
Chapter 31 modification of PTI 06-05872, issued 11/26/02, to increase allowable OC emissions, See Section F.1.		OAC rule 3745-21-07(G)(2)
		OAC rule 3745-17-07(A)
	OAC rule 3745-35-07(B)	OAC rule 3745-17-11(B)(1)

The O**PTI A****Issued: 1/11/2005**Emissions Unit ID: **R104**

Applicable Emissions
Limitations/Control Measures

Organic compound (OC) emissions shall not exceed 8 pounds (lbs)/hr, including cleanup materials, on any day in which no photochemically reactive material (coating or cleanup material) is employed in this emissions unit.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-35-07(B), 3745-21-07(G)(2), 3745-17-07(A) and 3745-17-11(B)(1).

Emissions of any single hazardous air pollutant (HAP) from this facility shall be less than 9.9 tons as a rolling, 12-month summation.

Emissions of any combination of HAPs from this facility shall be less than 24.9 tons as a rolling, 12-month summation.

See Sections A.2.a and B.1 below.

OC emissions from emissions units R101, R102, R103, R104, R105, and R106 combined shall not exceed 51.1 tons as a rolling, 12-month summation.

See Section B.2 below.

OC emissions shall not exceed 8 lbs/hr and 40 lbs/day on any day in which a photochemically reactive material (coating or cleanup material) is employed in this emissions unit.

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Particulate emissions shall not exceed 2.58 lbs/hr.

2. Additional Terms and Conditions

- 2.a** For purposes of limiting facility-wide HAPs emissions, the facility is comprised of the following emissions units: P001, P002, P003, P004, P005, P006, P007, P008, P009, R101, R102, R103, R104, R105, and R106.
- 2.b** The permittee shall employ a spray booth filter having a design control efficiency for particulates greater than 98% during any time the emissions unit is in operation.

B. Operational Restrictions

1. The permittee has requested a federally enforceable limitation on facility-wide HAPs emissions for purposes of limiting potential to emit. Therefore, the maximum facility-wide HAPs emissions shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, based on rolling, 12-month summations. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAPs emissions specified in the following table:

<u>Month(s)</u>	<u>Maximum facility-wide single HAP emissions (tons)</u>	<u>Maximum facility-wide combined HAPs emissions (tons)</u>
1	0.9	2.1
1-2	1.8	4.2
1-3	2.7	6.3
1-4	3.6	8.4
1-5	4.5	10.5
1-6	5.4	12.6
1-7	6.3	14.7
1-8	7.2	16.8
1-9	8.1	18.9
1-10	9.0	21.0
1-11	9.9	23.1
1-12	9.9	24.9

After the first 12 calendar months of operation following issuance of this permit, compliance with the HAPs emissions limitations shall be based on rolling, 12-month summations.

2. The maximum material usage for emissions units R101, R102, R103, R104, R105, and R106 combined shall not cause OC emissions to exceed 51.1 tons as a rolling, 12-month summation,

calculated using the following formula:

$$51.1 \text{ tons OC} \geq \sum_{n=1}^i \frac{(P_i)(OC_i)}{2000 \text{ lbs/ton}} + \frac{(S_j)(OC_j)}{2000 \text{ lbs/ton}}$$

where:

P_i = usage of coating i in gallons

OC_i = Organic compound content of coating i in pounds OC per gallon.

S_j = usage of cleanup material j in gallons

OC_j = Organic compound content of cleanup material j in pounds OC per gallon.

The permittee has sufficient existing records to demonstrate compliance with this limitation during the first twelve months after issuance of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the coating operation:
 - a. the company identification for each coating and cleanup material employed;
 - b. documentation on whether or not each coating and cleanup material is a photochemically reactive material;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the OC content of each coating and cleanup material, in pounds per gallon;
 - e. the total number of hours the emissions unit was in operation;
 - f. the total daily OC emission rate for all coatings, in pounds per day;
 - g. the total daily OC emission rate for all photochemically reactive cleanup materials, in pounds per day;
 - h. the total daily OC emission rate for all non-photochemically reactive cleanup materials, in pounds per day;
 - i. for each day during which a photochemically reactive material (coating or cleanup

material) is employed, the total OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., [(f) + (g)], in pounds per day;

- j. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., [(i)/(e)], in pounds per hour (average);
- k. for each day during which a photochemically reactive material is not employed, the total OC emission rate for all coatings and cleanup materials, i.e., [(f) + (g) + (h)], in pounds per day; and
- l. for each day during which a photochemically reactive material is not employed, the average hourly OC emission rate for all coatings and cleanup materials, i.e., [(k)/(e)], in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

- 2. The permittee shall collect and record the following information each month for the facility:
 - a. the name and identification number of each coating, thinner, and cleanup material employed;
 - b. the individual HAP* content for each HAP of each coating and cleanup material, in pounds of individual HAP per gallon;
 - c. the number of gallons of each coating, thinner, and cleanup material employed;
 - d. the total pounds of each individual HAP recovered in solvent waste;
 - e. the total individual HAP emissions for each HAP from all coatings, thinners, and cleanup materials, in tons per month (i.e., the sum of [(C.2.b.) x (C.2.c.) - (C.2.d)] for each individual HAP, divided by 2,000 lbs/ton);
 - f. the rolling, 12-month summation of the total individual HAP emissions from all emissions units at the facility, in tons (i.e. the sum of individual HAP emissions for the current month and the preceding eleven calendar months);

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- g. the total combined HAP emissions from all coatings, thinners, and cleanup materials, in tons per month (i.e., sum of individual HAP emissions from all coatings and cleanup materials as determined in C.2.e); and
- h. the rolling, 12-month summation of the total combined HAP emissions from all emissions units at the facility, in tons (i.e. the sum of combined HAP emissions for the current month and the preceding eleven calendar months).

*A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Southeast District Office. This information does not have to be kept on a line-by-line basis.

- 3. The permittee shall collect and record the following information each month for emissions units R101, R102, R103, R104, R105, and R106 combined:
 - a. the total OC emissions for each month, in tons, calculated according to the formula specified in Section B.2; and
 - b. the rolling, 12-month summation of the total OC emissions, in tons (i.e., the sum of the total combined OC emissions for the current month and the preceding eleven calendar months).
- 4. The permittee shall maintain daily records that document any time periods when the spray booth filter was not in service when the emissions unit was in operation.
- 5. The permit to install for this emissions unit (R104) 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. 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: Methyl Ethyl Ketone (MEK)

TLV (mg/m³): 589,780

Maximum Hourly Emission Rate (lbs/hr): 3.81

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 802

MAGLC (ug/m3): 14,042

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 (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.).

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

6. 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.);

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- 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 notify the Ohio EPA Southeast District Office in writing of any daily record showing that the spray booth filter was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Ohio EPA Southeast District Office within 30 days after the event occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. for the days during which no photochemically reactive materials were employed, an identification of each day during which the average hourly OC emissions from the coatings and cleanup materials exceeded 8 lbs/hr, and the actual average hourly OC emissions for each such day;
 - b. for the days during which photochemically reactive materials were employed, an identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 lbs/hr, and the actual average hourly OC emissions for each such day;
 - c. for the days during which photochemically reactive materials were employed, an identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 lbs/day, and the actual OC emissions for each such day;
 - d. for the first 12 calendar months of operation following the issuance of this permit, an identification of all exceedances of the maximum allowable cumulative facility-wide single HAP emissions and facility-wide combined HAPs emissions;
 - e. beginning after the first 12 calendar months of operation following the issuance of this permit, an identification of all exceedances of the rolling, 12-month facility-wide single HAP and combined HAPs limitations; and
 - f. an identification of all exceedances of the rolling, 12-month OC limitation for emissions units R101, R102, R103, R104, R105, and R106 combined.

These reports shall be submitted in accordance with Section A.2 of the General Terms and Conditions of this permit.

E. Testing Requirements

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

- a. **Emission Limitation:**
OC emissions shall not exceed 8 lbs/hr, including cleanup materials, on any day in which no photochemically reactive material (coating or cleanup material) is employed in this emissions unit.

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements specified in Section C.1.

- b. **Emission Limitation:**
Emissions of any single HAP from this facility shall be less than 9.9 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on the record keeping requirements specified in Section C.2.

- c. **Emission Limitation:**
Emissions of any combination of HAPs from this facility shall be less than 24.9 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on the record keeping requirements specified in Section C.2.

- d. **Emission Limitation:**
OC emissions from emissions units R101, R102, R103, R104, R105, and R106 combined shall not exceed 51.1 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on the record keeping requirements specified in Section C.3.

- e. **Emission Limitation:**

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OC emissions shall not exceed 8 lbs/hr and 40 lbs/day on any day in which a photochemically reactive material (coating or cleanup material) is employed in this emissions unit.

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements specified in Section C.1.

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- f. Emission Limitation:
 Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A. No visible emissions testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

- g. Emission Limitation: Particulate emissions shall not exceed 2.58 lbs/hr.

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation shall be used:

$$E = (M) * (1-TE) * (1-CE)$$

where:

E = particulate emission rate (lbs/hr)

M = maximum coating solids usage rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment - If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

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

F. Miscellaneous Requirements

1. This emissions unit was previously identified as emissions unit R012, Spray Booth #4R.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
R105 - Spray Booth E	OAC rule 3745-31-05(A)(3)
Chapter 31 modification of PTI 06-05329, issued 7/29/98, to increase allowable OC emissions, See Section F.1.	OAC rule 3745-21-07(G)(2)
	OAC rule 3745-17-07(A)
	OAC rule 3745-35-07(B)
	OAC rule 3745-17-11(B)(1)

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Applicable Emissions
Limitations/Control Measures

Organic compound (OC) emissions shall not exceed 8 pounds (lbs)/hr, including cleanup materials, on any day in which no photochemically reactive material (coating or cleanup material) is employed in this emissions unit.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-35-07(B), 3745-21-07(G)(2), 3745-17-07(A) and 3745-17-11(B)(1).

Emissions of any single hazardous air pollutant (HAP) from this facility shall be less than 9.9 tons as a rolling, 12-month summation.

Emissions of any combination of HAPs from this facility shall be less than 24.9 tons as a rolling, 12-month summation.

See Sections A.2.a and B.1 below.

OC emissions from emissions units R101, R102, R103, R104, R105, and R106 combined shall not exceed 51.1 tons as a rolling, 12-month summation.

See Section B.2 below.

OC emissions shall not exceed 8 lbs/hr and 40 lbs/day on any day in which a photochemically reactive material (coating or cleanup material) is employed in this emissions unit.

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Particulate emissions shall not exceed 2.58 lbs/hr.

2. Additional Terms and Conditions

- 2.a** For purposes of limiting facility-wide HAPs emissions, the facility is comprised of the following emissions units: P001, P002, P003, P004, P005, P006, P007, P008, P009, R101, R102, R103, R104, R105, and R106.
- 2.b** The permittee shall employ a spray booth filter having a design control efficiency for particulates greater than 98% during any time the emissions unit is in operation.

B. Operational Restrictions

1. The permittee has requested a federally enforceable limitation on facility-wide HAPs emissions for purposes of limiting potential to emit. Therefore, the maximum facility-wide HAPs emissions shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, based on rolling, 12-month summations. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAPs emissions specified in the following table:

<u>Month(s)</u>	<u>Maximum facility-wide single HAP emissions (tons)</u>	<u>Maximum facility-wide combined HAPs emissions (tons)</u>
1	0.9	2.1
1-2	1.8	4.2
1-3	2.7	6.3
1-4	3.6	8.4
1-5	4.5	10.5
1-6	5.4	12.6
1-7	6.3	14.7
1-8	7.2	16.8
1-9	8.1	18.9
1-10	9.0	21.0
1-11	9.9	23.1
1-12	9.9	24.9

After the first 12 calendar months of operation following issuance of this permit, compliance with the HAPs emissions limitations shall be based on rolling, 12-month summations.

2. The maximum material usage for emissions units R101, R102, R103, R104, R105, and R106 combined shall not cause OC emissions to exceed 51.1 tons as a rolling, 12-month summation,

calculated using the following formula:

$$51.1 \text{ tons OC} \geq \sum_{n=1}^i \frac{(P_i)(OC_i)}{2000 \text{ lbs/ton}} + \frac{(S_j)(OC_j)}{2000 \text{ lbs/ton}}$$

where:

P_i = usage of coating i in gallons

OC_i = Organic compound content of coating i in pounds OC per gallon.

S_j = usage of cleanup material j in gallons

OC_j = Organic compound content of cleanup material j in pounds OC per gallon.

The permittee has sufficient existing records to demonstrate compliance with this limitation during the first twelve months after issuance of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the coating operation:
 - a. the company identification for each coating and cleanup material employed;
 - b. documentation on whether or not each coating and cleanup material is a photochemically reactive material;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the OC content of each coating and cleanup material, in pounds per gallon;
 - e. the total number of hours the emissions unit was in operation;
 - f. the total daily OC emission rate for all coatings, in pounds per day;
 - g. the total daily OC emission rate for all photochemically reactive cleanup materials, in pounds per day;
 - h. the total daily OC emission rate for all non-photochemically reactive cleanup materials, in pounds per day;
 - i. for each day during which a photochemically reactive material (coating or cleanup

material) is employed, the total OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., [(f) + (g)], in pounds per day;

- j. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., [(i)/(e)], in pounds per hour (average);
- k. for each day during which a photochemically reactive material is not employed, the total OC emission rate for all coatings and cleanup materials, i.e., [(f) + (g) + (h)], in pounds per day; and
- l. for each day during which a photochemically reactive material is not employed, the average hourly OC emission rate for all coatings and cleanup materials, i.e., [(k)/(e)], in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

- 2. The permittee shall collect and record the following information each month for the facility:
 - a. the name and identification number of each coating, thinner, and cleanup material employed;
 - b. the individual HAP* content for each HAP of each coating and cleanup material, in pounds of individual HAP per gallon;
 - c. the number of gallons of each coating, thinner, and cleanup material employed;
 - d. the total pounds of each individual HAP recovered in solvent waste;
 - e. the total individual HAP emissions for each HAP from all coatings, thinners, and cleanup materials, in tons per month (i.e., the sum of [(C.2.b.) x (C.2.c.) - (C.2.d)] for each individual HAP, divided by 2,000 lbs/ton);
 - f. the rolling, 12-month summation of the total individual HAP emissions from all emissions units at the facility, in tons (i.e. the sum of individual HAP emissions for the current month and the preceding eleven calendar months);

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- g. the total combined HAP emissions from all coatings, thinners, and cleanup materials, in tons per month (i.e., sum of individual HAP emissions from all coatings and cleanup materials as determined in C.2.e); and
- h. the rolling, 12-month summation of the total combined HAP emissions from all emissions units at the facility, in tons (i.e. the sum of combined HAP emissions for the current month and the preceding eleven calendar months).

*A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Southeast District Office. This information does not have to be kept on a line-by-line basis.

- 3. The permittee shall collect and record the following information each month for emissions units R101, R102, R103, R104, R105, and R106 combined:
 - a. the total OC emissions for each month, in tons, calculated according to the formula specified in Section B.2; and
 - b. the rolling, 12-month summation of the total OC emissions, in tons (i.e., the sum of the total combined OC emissions for the current month and the preceding eleven calendar months).
- 4. The permittee shall maintain daily records that document any time periods when the spray booth filter was not in service when the emissions unit was in operation.
- 5. The permit to install for this emissions unit (R105) 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. 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: Methyl Ethyl Ketone (MEK)

TLV (mg/m³): 589,780

Maximum Hourly Emission Rate (lbs/hr): 3.81

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 802

MAGLC (ug/m3): 14,042

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 (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.).

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

6. 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.);

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- 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 notify the Ohio EPA Southeast District Office in writing of any daily record showing that the spray booth filter was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Ohio EPA Southeast District Office within 30 days after the event occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. for the days during which no photochemically reactive materials were employed, an identification of each day during which the average hourly OC emissions from the coatings and cleanup materials exceeded 8 lbs/hr, and the actual average hourly OC emissions for each such day;
 - b. for the days during which photochemically reactive materials were employed, an identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 lbs/hr, and the actual average hourly OC emissions for each such day;
 - c. for the days during which photochemically reactive materials were employed, an identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 lbs/day, and the actual OC emissions for each such day;
 - d. for the first 12 calendar months of operation following the issuance of this permit, an identification of all exceedances of the maximum allowable cumulative facility-wide single HAP emissions and facility-wide combined HAPs emissions;
 - e. beginning after the first 12 calendar months of operation following the issuance of this permit, an identification of all exceedances of the rolling, 12-month facility-wide single HAP and combined HAPs limitations; and
 - f. an identification of all exceedances of the rolling, 12-month OC limitation for emissions units R101, R102, R103, R104, R105, and R106 combined.

These reports shall be submitted in accordance with Section A.2 of the General Terms and Conditions of this permit.

E. Testing Requirements

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

- a. **Emission Limitation:**
OC emissions shall not exceed 8 lbs/hr, including cleanup materials, on any day in which no photochemically reactive material (coating or cleanup material) is employed in this emissions unit.

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements specified in Section C.1.

- b. **Emission Limitation:**
Emissions of any single HAP from this facility shall be less than 9.9 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on the record keeping requirements specified in Section C.2.

- c. **Emission Limitation:**
Emissions of any combination of HAPs from this facility shall be less than 24.9 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on the record keeping requirements specified in Section C.2.

- d. **Emission Limitation:**
OC emissions from emissions units R101, R102, R103, R104, R105, and R106 combined shall not exceed 51.1 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on the record keeping requirements specified in Section C.3.

- e. **Emission Limitation:**

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OC emissions shall not exceed 8 lbs/hr and 40 lbs/day on any day in which a photochemically reactive material (coating or cleanup material) is employed in this emissions unit.

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements specified in Section C.1.

- f. Emission Limitation:
Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A. No visible emissions testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

- g. Emission Limitation: Particulate emissions shall not exceed 2.58 lbs/hr.

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation shall be used:

$$E = (M) * (1-TE) * (1-CE)$$

where:

E = particulate emission rate (lbs/hr)

M = maximum coating solids usage rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment - If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

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

F. Miscellaneous Requirements

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1. This emissions unit was previously identified as emissions unit R010 Spray Booth #6.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
R106 - Spray Booth F	OAC rule 3745-31-05(A)(3)
Chapter 31 modification of PTI 06-05329, issued 7/29/98, to increase allowable OC emissions, See Section F.1.	OAC rule 3745-21-07(G)(2)
	OAC rule 3745-17-07(A)
	OAC rule 3745-35-07(B)
	OAC rule 3745-17-11(B)(1)

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Applicable Emissions
Limitations/Control Measures

Organic compound (OC) emissions shall not exceed 8 pounds (lbs)/hr, including cleanup materials, on any day in which no photochemically reactive material (coating or cleanup material) is employed in this emissions unit.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-35-07(B), 3745-21-07(G)(2), 3745-17-07(A) and 3745-17-11(B)(1).

Emissions of any single hazardous air pollutant (HAP) from this facility shall be less than 9.9 tons as a rolling, 12-month summation.

Emissions of any combination of HAPs from this facility shall be less than 24.9 tons as a rolling, 12-month summation.

See Sections A.2.a and B.1 below.

OC emissions from emissions units R101, R102, R103, R104, R105, and R106 combined shall not exceed 51.1 tons as a rolling, 12-month summation.

See Section B.2 below.

OC emissions shall not exceed 8 lbs/hr and 40 lbs/day on any day in which a photochemically reactive material (coating or cleanup material) is employed in this emissions unit.

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Particulate emissions shall not exceed 2.58 lbs/hr.

2. Additional Terms and Conditions

- 2.a** For purposes of limiting facility-wide HAPs emissions, the facility is comprised of the following emissions units: P001, P002, P003, P004, P005, P006, P007, P008, P009, R101, R102, R103, R104, R105, and R106.
- 2.b** The permittee shall employ a spray booth filter having a design control efficiency for particulates greater than 98% during any time the emissions unit is in operation.

B. Operational Restrictions

1. The permittee has requested a federally enforceable limitation on facility-wide HAPs emissions for purposes of limiting potential to emit. Therefore, the maximum facility-wide HAPs emissions shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, based on rolling, 12-month summations. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAPs emissions specified in the following table:

<u>Month(s)</u>	<u>Maximum facility-wide single HAP emissions (tons)</u>	<u>Maximum facility-wide combined HAPs emissions (tons)</u>
1	0.9	2.1
1-2	1.8	4.2
1-3	2.7	6.3
1-4	3.6	8.4
1-5	4.5	10.5
1-6	5.4	12.6
1-7	6.3	14.7
1-8	7.2	16.8
1-9	8.1	18.9
1-10	9.0	21.0
1-11	9.9	23.1
1-12	9.9	24.9

After the first 12 calendar months of operation following issuance of this permit, compliance with the HAPs emissions limitations shall be based on rolling, 12-month summations.

2. The maximum material usage for emissions units R101, R102, R103, R104, R105, and R106 combined shall not cause OC emissions to exceed 51.1 tons as a rolling, 12-month summation, calculated using the following formula:

$$51.1 \text{ tons OC} \geq \sum_{n=1}^i \frac{(P_i)(OC_i)}{2000 \text{ lbs/ton}} + \frac{(S_j)(OC_j)}{2000 \text{ lbs/ton}}$$

where:

P_i = usage of coating i in gallons

OC_i = Organic compound content of coating i in pounds OC per gallon.

S_j = usage of cleanup material j in gallons

OC_j = Organic compound content of cleanup material j in pounds OC per gallon.

The permittee has sufficient existing records to demonstrate compliance with this limitation during the first twelve months after issuance of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the coating operation:
 - a. the company identification for each coating and cleanup material employed;
 - b. documentation on whether or not each coating and cleanup material is a photochemically reactive material;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the OC content of each coating and cleanup material, in pounds per gallon;
 - e. the total number of hours the emissions unit was in operation;
 - f. the total daily OC emission rate for all coatings, in pounds per day;
 - g. the total daily OC emission rate for all photochemically reactive cleanup materials, in pounds per day;
 - h. the total daily OC emission rate for all non-photochemically reactive cleanup materials, in pounds per day;
 - i. for each day during which a photochemically reactive material (coating or cleanup

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material) is employed, the total OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., [(f) + (g)], in pounds per day;

- j. for each day during which a photochemically reactive material (coating or cleanup material) is employed, the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., [(i)/(e)], in pounds per hour (average);
- k. for each day during which a photochemically reactive material is not employed, the total OC emission rate for all coatings and cleanup materials, i.e., [(f) + (g) + (h)], in pounds per day; and
- l. for each day during which a photochemically reactive material is not employed, the average hourly OC emission rate for all coatings and cleanup materials, i.e., [(k)/(e)], in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

2. The permittee shall collect and record the following information each month for the facility:
 - a. the name and identification number of each coating, thinner, and cleanup material employed;
 - b. the individual HAP* content for each HAP of each coating and cleanup material, in pounds of individual HAP per gallon;
 - c. the number of gallons of each coating, thinner, and cleanup material employed;
 - d. the total pounds of each individual HAP recovered in solvent waste;
 - e. the total individual HAP emissions for each HAP from all coatings, thinners, and cleanup materials, in tons per month (i.e., the sum of [(C.2.b.) x (C.2.c.) - (C.2.d)] for each individual HAP, divided by 2,000 lbs/ton);
 - f. the rolling, 12-month summation of the total individual HAP emissions from all emissions units at the facility, in tons (i.e. the sum of individual HAP emissions for the current month and the preceding eleven calendar months);
 - g. the total combined HAP emissions from all coatings, thinners, and cleanup materials, in tons per month (i.e., sum of individual HAP emissions from all coatings and cleanup

materials as determined in C.2.e); and

- h. the rolling, 12-month summation of the total combined HAP emissions from all emissions units at the facility, in tons (i.e. the sum of combined HAP emissions for the current month and the preceding eleven calendar months).

*A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Southeast District Office. This information does not have to be kept on a line-by-line basis.

3. The permittee shall collect and record the following information each month for emissions units R101, R102, R103, R104, R105, and R106 combined:
 - a. the total OC emissions for each month, in tons, calculated according to the formula specified in Section B.2; and
 - b. the rolling, 12-month summation of the total OC emissions, in tons (i.e., the sum of the total combined OC emissions for the current month and the preceding eleven calendar months).
4. The permittee shall maintain daily records that document any time periods when the spray booth filter was not in service when the emissions unit was in operation.
5. The permit to install for this emissions unit (R106) 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. 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: Methyl Ethyl Ketone (MEK)

TLV (mg/m³): 589,780

Maximum Hourly Emission Rate (lbs/hr): 3.81

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Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 802

MAGLC (ug/m3): 14,042

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 (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.).

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

6. 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 notify the Ohio EPA Southeast District Office in writing of any daily record showing that the spray booth filter was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Ohio EPA Southeast District Office within 30 days after the event occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. for the days during which no photochemically reactive materials were employed, an identification of each day during which the average hourly OC emissions from the coatings and cleanup materials exceeded 8 lbs/hr, and the actual average hourly OC emissions for each such day;
 - b. for the days during which photochemically reactive materials were employed, an identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 lbs/hr, and the actual average hourly OC emissions for each such day;
 - c. for the days during which photochemically reactive materials were employed, an identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 lbs/day, and the actual OC emissions for each such day;
 - d. for the first 12 calendar months of operation following the issuance of this permit, an identification of all exceedances of the maximum allowable cumulative facility-wide single HAP emissions and facility-wide combined HAPs emissions;
 - e. beginning after the first 12 calendar months of operation following the issuance of this permit, an identification of all exceedances of the rolling, 12-month facility-wide single HAP and combined HAPs limitations; and
 - f. an identification of all exceedances of the rolling, 12-month OC limitation for emissions units R101, R102, R103, R104, R105, and R106 combined.

These reports shall be submitted in accordance with Section A.2 of the General Terms and Conditions of this permit.

E. Testing Requirements

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

- a. Emission Limitation:
OC emissions shall not exceed 8 lbs/hr, including cleanup materials, on any day in which no photochemically reactive material (coating or cleanup material) is employed in this emissions unit.

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements specified in Section C.1.

- b. Emission Limitation:
Emissions of any single HAP from this facility shall be less than 9.9 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on the record keeping requirements specified in Section C.2.

- c. Emission Limitation:
Emissions of any combination of HAPs from this facility shall be less than 24.9 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on the record keeping requirements specified in Section C.2.

- d. Emission Limitation:
OC emissions from emissions units R101, R102, R103, R104, R105, and R106 combined shall not exceed 51.1 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on the record keeping requirements specified in Section C.3.

- e. Emission Limitation:
OC emissions shall not exceed 8 lbs/hr and 40 lbs/day on any day in which a photochemically reactive material (coating or cleanup material) is employed in this

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emissions unit.

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements specified in Section C.1.

- f. Emission Limitation:
Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A. No visible emissions testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

- g. Emission Limitation: Particulate emissions shall not exceed 2.58 lbs/hr.

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation shall be used:

$$E = (M) * (1-TE) * (1-CE)$$

where:

E = particulate emission rate (lbs/hr)

M = maximum coating solids usage rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment - If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

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

F. Miscellaneous Requirements

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1. This emissions unit was previously identified as emissions unit R011, Spray Booth #7.