

Facility ID: 0514000178 Issuance type: Final State Permit To Operate

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

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

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

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 0514000178 Emissions Unit ID: P052 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

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

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

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
(P052) - Transfer Compression Molder 83	OAC rule 3745-31-05(A)(3) and PTI 0514395	The organic compound (OC) emissions from this emissions unit shall not exceed 0.26 pounds per hour.  (See Section A.2.a.)
	OAC rule 3745-31-05(C) Synthetic Minor to avoid Title V	Ohio Toxic Policy The combined overall organic compound (OC) emissions from the use materials in emission units at this facility P001 through P082, shall not exceed 24.0 tons per 12 month period.  The combined overall of Hazardous Air Pollutants (HAPs) emissions, as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units P001 through P082 shall not exceed 9.0 TPY* for any single HAP and 24.0 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.  (See Section A.2.b.)
	OAC Rule 3745-21-07(G)(2)	The emission limitation of specified by this rule is less stringent than the maximum potential emission rate of this emissions unit.  (See Section A.2.a.)

**2. Additional Terms and Conditions**

- (a) The hourly maximum potential emission rate for OC from this emissions unit is 0.26 pounds. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this potential and the hourly and daily OC limitations as established under OAC Rule 3745-21-07(G)(2), when Photochemically Reactive Material (PRM) are employed.  
The actual usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units P001 through P082 shall not exceed 9.0 TPY\* for any single HAP and 24.0 TPY\* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

\*This assumes the HAPs emitted are on the amount of HAPs containing monomer and USEPA Guidance "Locating and Estimating Air Emissions From Sources of Styrene", April 1993, Table 26, 0.02 lbs of VOC emitted per lb of monomer used.

**B. Operational Restrictions**

1. The combined monomer usage in emissions units P001 through P082, shall not exceed 1,200 tons per year, based upon a rolling, 12-month summation of all monomer materials employed in these emissions units.

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

1. This facility shall maintain the following monthly records on all materials employed in emissions units P001 through P082:
  - a.the name of the material employed;
  - b.the amount of material employed, in tons;
  - c.the monomer content, in percent by weight;
  - d.the amount of monomer employed, in tons;
  - e.the OC emission of all materials employed, in tons per month,[the sum of (d) multiplied by 0.02\*];
  - f.the 12-month rolling total amount of monomer employed, in tons per last 12-month period.
  - g.the 12-month rolling total amount of OC emitted from the use of all materials employed, in tons per last 12-month period.

\* This assumes the amount of OC emitted are based on the percent by weight of the monomer in the materials employed and Emission factors from "Locating and Estimating Air Emissions from Sources of Styrene", USEPA April 1993, Table 27, Closed Molding.
2. The permittee shall collect and record the following information each month for the HAP(s) employed in the following emissions units: P001 through P082:
  - a.the emission unit's source identification and description that Hazardous Air Pollutant (HAP) containing materials were employed;
  - b.the name and identification number of each HAP containing material employed;
  - c.the individual HAP\* content for each HAP containing material employed, in percent by weight, as employed;
  - d.The amount of each HAP containing material employed, in tons;
  - e.the total individual HAP usage for each HAP from the above listed materials employed, in pounds or tons per month [for each HAP the sum of (c) times (d)];
  - f.the total combined HAP usage from all above listed materials employed, in pounds or tons per month [the sum of (c) times (d) for each material];
  - g.the total individual HAP emissions for each HAP from the above listed materials employed, in pounds or tons per month [the sum of (e) multiplied by 0.02\*\*];
  - h.the total combined HAP emissions for each HAP from the above listed materials employed, in pounds or tons per month [the sum of (f) multiplied by 0.02\*\*];
  - i.the updated rolling, 12-month summation of usage for each individual HAP\*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
  - j.the updated rolling, 12-month summation of usage for total combined HAP, in pounds or tons. This shall include the information 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 your Ohio EPA, Southwest District Office contact. This information does not have to be kept on a line-by-line basis.

\*\*This assumes the HAP(s) emitted are based on the percent by weight of HAP(s) in the materials employed and Emission factors from "Locating and Estimating Air Emission
3. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. 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 Maximum in-stack concentration was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results for the "worst case" pollutant(s):
 

Pollutant: Styrene

TLV (mg/m3): 85

Maximum Hourly Emission Rate (lbs/hr): 0.26

Maximum Ground Level Concentration (beyond fence line): 0.07 mg/m3

MAGLC (ppm): 2.02
4. 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine

that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a.a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b.documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c.where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include the following information:

a.an identification of each period during which the combined OC emissions from the materials employed in emissions units P001 through P082 exceeded 24.0 tons per year, based on a 12-month rolling average;

b.an identification of each period during which the combined monomer usage in emissions units P001 through P082 exceeded 1,200 tons per year, based on a 12-month rolling average;

c.an identification of each 12-month period during which the individual HAP emissions from the materials employed in emissions units P001 through P082 exceeded 9.0 tons per year, based on a 12-month rolling average; and

d.an identification of each 12-month period during which the combined HAP's emissions from the materials employed in emissions units P001 through P082 exceeded 24.0 tons per year, based on a 12-month rolling average.

2. The deviation (excursion) reports shall be submitted as quarterly reports specified in Part I, General Term and Condition A.2 of this permit.

**E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

a.Emission Limitation:

9.0 TPY\* for any single HAP and 24.0 TPY\* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections C.2.i. and C.2.j., respectively, of these T&C's.

Formulation data or USEPA Method 24 (for coatings) shall be used to determine the organic compound contents materials employed.

b.Emission Limitation:

24.0 tons of OC per year, based on a rolling, 12-month summation.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections C.1.g., of these T&C's.

Formulation data or USEPA Method 24 (for coatings) shall be used to determine the organic compound contents materials employed.

**F. Miscellaneous Requirements**

1. The following terms and conditions are federally enforceable: A., B., C.1., 2., D. and E.