



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

**RE: FINAL PERMIT TO INSTALL
CLERMONT COUNTY
Application No: 14-05196**

CERTIFIED MAIL

	TOXIC REVIEW
	PSD
Y	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
Y	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

DATE: 7/9/2002

Cincinnati Fiberglass
John Glass
4174 Half Acre Road
Batavia, OH 45103

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
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

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

CC: USEPA

HCDES



**Permit To Install
Terms and Conditions**

**Issue Date: 7/9/2002
Effective Date: 7/9/2002**

FINAL PERMIT TO INSTALL 14-05196

Application Number: 14-05196
APS Premise Number: 1413020248
Permit Fee: **\$4800**
Name of Facility: Cincinnati Fiberglass
Person to Contact: John Glass
Address: 4174 Half Acre Road
Batavia, OH 45103

Location of proposed air contaminant source(s) [emissions unit(s)]:
**4174 Half Acre Road
Batavia Ohio, Ohio**

Description of proposed emissions unit(s):
Various fiberglass reinforced plastics manufacturing processes.

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

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.10 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is

granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

12. 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.

B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

4. 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.

5. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

6. 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.

7. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

8. 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.

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit To Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	69
PM/PM10	1.38
Acetone	56.9

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

None

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

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P002 - RTM Pump 1 Bldg B	OAC rule 3745-31-05(A)(3)	5 lbs/hr OC from coatings 40 lbs/day OC from coatings 19.8 lbs/day Acetone (OC) from cleanup materials 2.97 TPY of Acetone (OC) from cleanup materials The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-31-28.
	OAC rule 3745-31-05(D)	See term A.I.2.b.
	OAC rule 3745-21-07(G)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-28	The requirements of this rule are satisfied by the requirements established in accordance with OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the cleanup material usage limits, OC emission limitations and compliance with the Air Toxics Policy.
- 2.b The annual OC emission limit, from coatings, employed in emissions units P002 through P005, P030, P031, P033 and P034, combined shall not exceed 25.0 TPY, based on a rolling, 12-month summation.

II. Operational Restrictions

1. The amount of cleanup material employed in emissions unit P002 shall not exceed 3.0 gallons/day and 900 gallons/year.
2. The permittee shall employ nonphotochemically reactive cleanup materials in emissions unit P002.
3. The permittee shall employ cleanup materials in emissions unit P002 which have a maximum OC content of 6.6 pounds per gallon.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for emissions unit P002:
 - a. The company identification for each coating (neat resin) and cleanup material employed.
 - b. The number of pounds of each coating material employed.
 - c. The percent styrene of each coating employed in each emissions unit.
 - d. The number of gallons of cleanup material employed.
 - e. The organic compound content of the cleanup material, in pounds per gallon.
 - f. The total organic compound emission rate for all coatings, in pounds per day.
 - g. The daily emissions from cleanup materials (d x e).
 - h. The total number of hours the emissions unit was in operation.
 - i. The average hourly organic compound emission rate for all coatings, in pounds per hour (f/h).
 - j. A record of each liquid organic cleanup material employed in emissions unit P002 indicating whether or not the liquid organic material is photochemically reactive as defined in OAC rule 3745-21-01(C)(5).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

2. The permittee shall collect and record the following information for each month for emissions unit P002:
 - a. The total number of gallons of cleanup material employed each month.
 - b. The organic compound content of the cleanup material, in pounds per gallon.
 - c. The monthly Acetone (OC) emissions from cleanup materials (a x b).
3. In order to determine compliance with the group annual OC emission limit, the permittee shall maintain monthly records of the following information for emissions units: P002 through P005, P030, P031, P033 and P034.
 - a. The company identification for each coating (neat resin) employed in each emissions unit.
 - b. The number of pounds of each coating material employed in each emissions unit.
 - c. The percent styrene of each coating employed in each emissions unit.
 - d. The total organic compound emission rate for all coatings, in pounds per month.
 - e. The rolling, 12-month summation of the total coating usage figures for emissions units P002 through P005, P030, P031, P033 and P034.
 - f. The rolling, 12-month summation of the OC emissions for emissions units P002 through P005, P030, P031, P033 and P034.

The permittee already has existing coating usage records, therefore cumulative coating usage records are not needed for the first year.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the daily and/or hourly emissions limitations in T&C A.I.1.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the usage limitations in T&C A.II.1.
3. The permittee shall submit deviation (excursion) reports which identify an exceedance of the OC content limitation in T&C A.II.3.
4. The permittee shall submit a deviation (excursion) report which identifies an exceedance of the annual Acetone (OC) emissions limit for cleanup materials.

5. The permittee shall submit quarterly reports which specify the total organic compound emissions from emissions units P002 through P005, P030, P031, P033 and P034, combined for each calendar month. These reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and cover the previous three calendar months.
6. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive cleanup material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
7. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the OC emission limitations, from coatings, for emissions unit P002 shall be demonstrated by the following:
 - a. Emission Factor: AP-42 Table 4.4-2
 - b. $\text{\#/hr OC emissions} = \text{\#/day OC emissions} \div \text{hours of operation}$
 - c. $\text{\#/day OC emissions} = \text{\# resin/day} \times \% \text{ styrene} \times \text{emission factor}$
 - d. $\text{Ton/yr OC emissions} = \text{Ton resin/yr} \times \% \text{ styrene} \times \text{emission factor}$

* Based on a rolling, 12-month summation.
2. Compliance with the Acetone (OC) emissions limitations, from cleanup materials, for emissions unit P002 shall be demonstrated by the recordkeeping in T&C A.III. 1 and 2.
3. Compliance with the usage restrictions in T&C A.II.1 shall be demonstrated by the recordkeeping in T&C A.III.1 and 2.
4. Compliance with the annual group emissions limit in A.I.2.b. shall be demonstrated by the recordkeeping in T&C A.III.3 and the equation in term A.V.1.d.

VI. Miscellaneous Requirements

1. Per an electronic mail from Keith Barnett of USEPA dated September 26, 2001, there are no control requirements for RTM units in the proposed MACT.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P002 - RTM Pump 1 Bldg B		See Term B. III. 1.

2. **Additional Terms and Conditions**

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. 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 Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s) from emissions units: P002-P006, P013-P017, P021, P025-P041.

Pollutant: Styrene

TLV (ug/m3): 85,000

Total Maximum Hourly Emission Rate for all styrene emitting emissions units (lbs/hr): 125.5

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1857

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 2029

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics 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 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.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied with 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.
- The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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 it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P003 - RTM Pump 2 Bldg B	OAC rule 3745-31-05(A)(3)	5 lbs/hr OC from coatings 40 lbs/day OC from coatings 19.8 lbs/day Acetone (OC) from cleanup materials 2.97 TPY Acetone (OC) from cleanup materials The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
	OAC rule 3745-31-05(D)	See term A.I.2.b.
	OAC rule 3745-21-07(G)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the cleanup material usage limits, OC emission limitations and compliance with the Air Toxics Policy.
- 2.b The annual OC emission limit, from coatings, employed in emissions units P002 through P005, P030, P031, P033 and P034, combined shall not exceed 25.0 TPY, based on a rolling, 12-month summation.

II. Operational Restrictions

1. The amount of cleanup material employed in emissions unit P003 shall not exceed 3.0 gallons/day and 900 gallons/year.

2. The permittee shall employ nonphotochemically reactive cleanup materials in emissions unit P003.
3. The permittee shall employ cleanup materials in emissions unit P003 which have a maximum OC content of 6.6 pounds per gallon.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for emissions unit P003:
 - a. The company identification for each coating (neat resin) and cleanup material employed.
 - b. The number of pounds of each coating material employed.
 - c. The percent styrene of each coating employed in each emissions unit.
 - d. The number of gallons of cleanup material employed.
 - e. The organic compound content of the cleanup material, in pounds per gallon.
 - f. The total organic compound emission rate for all coatings, in pounds per day.
 - g. The daily emissions from cleanup materials (d x e).
 - h. The total number of hours the emissions unit was in operation.
 - i. The average hourly organic compound emission rate for all coatings, in pounds per hour (f/h).
 - j. A record of each liquid organic cleanup material employed in emissions unit P003 indicating whether or not the liquid organic material is photochemically reactive as defined in OAC rule 3745-21-01(C)(5).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

2. The permittee shall collect and record the following information for each month for emissions unit P003:
 - a. The total number of gallons of cleanup material employed each month.
 - b. The organic compound content of the cleanup material, in pounds per gallon.
 - c. The monthly Acetone (OC) emissions from cleanup materials (a x b).

3. In order to determine compliance with the group annual OC emission limit, the permittee shall maintain monthly records of the following information for emissions units: P002 through P005, P030, P031, P033 and P034.
 - a. The company identification for each coating (neat resin) employed in each emissions unit.
 - b. The number of pounds of each coating material employed in each emissions unit.
 - c. The percent styrene of each coating employed in each emissions unit.
 - d. The total organic compound emission rate for all coatings, in pounds per month.
 - e. The rolling, 12-month summation of the total coating usage figures for emissions units P002 through P005, P030, P031, P033 and P034.
 - f. The rolling, 12-month summation of the OC emissions for emissions units P002 through P005, P030, P031, P033 and P034.

The permittee already has existing coating usage records, therefore cumulative coating usage records are not needed for the first year.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the daily and/or hourly emissions limitations in T&C A.I.1.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the usage limitations in T&C A.II.1.
3. The permittee shall submit deviation (excursion) reports which identify an exceedance of the OC content limitation in T&C A.II.3.
4. The permittee shall submit a deviation (excursion) report which identifies an exceedance of the annual Acetone (OC) emissions limit for cleanup materials.
5. The permittee shall submit quarterly reports which specify the total organic compound emissions from emissions units P002 through P005, P030, P031, P033 and P034, combined for each calendar month. These reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and cover the previous three calendar months.
6. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive cleanup material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

7. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the OC emission limitations, from coatings, for emissions unit P003 shall be demonstrated by the following:
 - a. Emission Factor: AP-42 Table 4.4-2
 - b. $\text{\#/hr OC emissions} = \text{\#/day OC emissions} \div \text{hours of operation}$
 - c. $\text{\#/day OC emissions} = \text{\# resin/day} \times \% \text{ styrene} \times \text{emission factor}$
 - d. $\text{Ton/yr OC emissions} = \text{Ton resin/yr}^* \times \% \text{ styrene} \times \text{emission factor}$

* Based on a rolling, 12-month summation.
2. Compliance with the Acetone (OC) emissions limitations, from cleanup materials, for emissions unit P003 shall be demonstrated by the recordkeeping in T&C A.III. 1 and 2.
3. Compliance with the usage restrictions in T&C A.II.1 shall be demonstrated by the recordkeeping in T&C A.III.1 and 2.
4. Compliance with the annual group emissions limit in A.I.2.b. shall be demonstrated by the recordkeeping in T&C A.III.3 and the equation in term A.V.1.d.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P003 - RTM Pump 2 Bldg B		See Term B.III.1

2. **Additional Terms and Conditions**

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. 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 Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s) from emissions units: P002-P006, P013-P017, P021, P025-P041.

Pollutant: Styrene

TLV (ug/m3): 85,000

Total Maximum Hourly Emission Rate for all styrene emitting emissions units (lbs/hr): 125.5

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1857

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 2029

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics 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 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.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied with 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.
- The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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 it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P004 - RTM Pump 3 Bldg B	OAC rule 3745-31-05(A)(3)	5 lbs/hr OC from coatings 40 lbs/day OC from coatings 19.8 lbs/day Acetone (OC) from cleanup materials 2.97 TPY Acetone (OC) from cleanup materials The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
	OAC rule 3745-31-05(D)	See term A.I.2.b.
	OAC rule 3745-21-07(G)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the cleanup material usage limits, OC emission limitations and compliance with the Air Toxics Policy.
- 2.b The annual OC emission limit, from coatings, employed in emissions units P002 through P005, P030, P031, P033 and P034, combined shall not exceed 25.0 TPY, based on a rolling, 12-month summation.

II. Operational Restrictions

1. The amount of cleanup material employed in emissions unit P004 shall not exceed 3.0 gallons/day and 900 gallons/year.

2. The permittee shall employ nonphotochemically reactive cleanup materials in emissions unit P004.
3. The permittee shall employ cleanup materials in emissions unit P004 which have a maximum OC content of 6.6 pounds per gallon.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for emissions unit P004:
 - a. The company identification for each coating (neat resin) and cleanup material employed.
 - b. The number of pounds of each coating material employed.
 - c. The percent styrene of each coating employed in each emissions unit.
 - d. The number of gallons of cleanup material employed.
 - e. The organic compound content of the cleanup material, in pounds per gallon.
 - f. The total organic compound emission rate for all coatings, in pounds per day.
 - g. The daily emissions from cleanup materials (d x e).
 - h. The total number of hours the emissions unit was in operation.
 - i. The average hourly organic compound emission rate for all coatings, in pounds per hour (f/h).
 - j. A record of each liquid organic cleanup material employed in emissions unit P002 indicating whether or not the liquid organic material is photochemically reactive as defined in OAC rule 3745-21-01(C)(5).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

2. The permittee shall collect and record the following information for each month for emissions unit P004:
 - a. The total number of gallons of cleanup material employed each month.
 - b. The organic compound content of the cleanup material, in pounds per gallon.
 - c. The monthly Acetone (OC) emissions from cleanup materials (a x b).

3. In order to determine compliance with the group annual OC emission limit, the permittee shall maintain monthly records of the following information for emissions units: P002 through P005, P030, P031, P033 and P034.
 - a. The company identification for each coating (neat resin) employed in each emissions unit.
 - b. The number of pounds of each coating material employed in each emissions unit.
 - c. The percent styrene of each coating employed in each emissions unit.
 - d. The total organic compound emission rate for all coatings, in pounds per month.
 - e. The rolling, 12-month summation of the total coating usage figures for emissions units P002 through P005, P030, P031, P033 and P034.
 - f. The rolling, 12-month summation of the OC emissions for emissions units P002 through P005, P030, P031, P033 and P034.

The permittee already has existing coating usage records, therefore cumulative coating usage records are not needed for the first year.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the daily and/or hourly emissions limitations in T&C A.I.1.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the usage limitations in T&C A.II.1.
3. The permittee shall submit deviation (excursion) reports which identify an exceedance of the OC content limitation in T&C A.II.3.
4. The permittee shall submit a deviation (excursion) report which identifies an exceedance of the annual Acetone (OC) emissions limit for cleanup materials.
5. The permittee shall submit quarterly reports which specify the total organic compound emissions from emissions units P002 through P005, P030, P031, P033 and P034, combined for each calendar month. These reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and cover the previous three calendar months.
6. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive cleanup material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

7. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the OC emission limitations, from coatings, for emissions unit P004 shall be demonstrated by the following:
 - a. Emission Factor: AP-42 Table 4.4-2
 - b. $\text{\#/hr OC emissions} = \text{\#/day OC emissions} \div \text{hours of operation}$
 - c. $\text{\#/day OC emissions} = \text{\# resin/day} \times \% \text{ styrene} \times \text{emission factor}$
 - d. $\text{Ton/yr OC emissions} = \text{Ton resin/yr}^* \times \% \text{ styrene} \times \text{emission factor}$

* Based on a rolling, 12-month summation.
2. Compliance with the Acetone (OC) emissions limitations, from cleanup materials, for emissions unit P004 shall be demonstrated by the recordkeeping in T&C A.III. 1 and 2.
3. Compliance with the usage restrictions in T&C A.II.1 shall be demonstrated by the recordkeeping in T&C A.III.1 and 2.
4. Compliance with the annual group emissions limit in A.I.2.b. shall be demonstrated by the recordkeeping in T&C A.III.3 and the equation in term A.V.1.d.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P004 - RTM Pump 3 Bldg B		See Term B. III. 1.

2. **Additional Terms and Conditions**

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. 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 Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s) from emissions units: P002-P006, P013-P017, P021, P025-P041.

Pollutant: Styrene

TLV (ug/m3): 85,000

Total Maximum Hourly Emission Rate for all styrene emitting emissions units (lbs/hr): 125.5

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1857

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 2029

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics 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 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.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied with 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.
- The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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 it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P005 - RTM Pump 4 Bldg B	OAC rule 3745-31-05(A)(3)	3 lbs/hr OC from coatings 40 lbs/day OC from coatings 19.8 lbs/day Acetone (OC) from cleanup materials 2.97 TPY of Acetone (OC) from cleanup materials The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-31-28.
	OAC rule 3745-31-05(D)	See term A.I.2.b.
	OAC rule 3745-21-07(G)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-28	The requirements of this rule are satisfied by the requirements established in accordance with OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the cleanup material usage limits, OC emission limitations and compliance with the Air Toxics Policy.
- 2.b The annual OC emission limit, from coatings, employed in emissions units P002 through P005, P030, P031, P033 and P034, combined shall not exceed 25.0 TPY, based on a rolling, 12-month summation.

II. Operational Restrictions

1. The amount of cleanup material employed in emissions unit P005 shall not exceed 3.0 gallons/day and 900 gallons/year.
2. The permittee shall employ nonphotochemically reactive cleanup materials in emissions unit P005.
3. The permittee shall employ cleanup materials in emissions unit P005 which have a maximum OC content of 6.6 pounds per gallon.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for emissions unit P005:
 - a. The company identification for each coating (neat resin) and cleanup material employed.
 - b. The number of pounds of each coating material employed.
 - c. The percent styrene of each coating employed in each emissions unit.
 - d. The number of gallons of cleanup material employed.
 - e. The organic compound content of the cleanup material, in pounds per gallon.
 - f. The total organic compound emission rate for all coatings, in pounds per day.
 - g. The daily emissions from cleanup materials (d x e).
 - h. The total number of hours the emissions unit was in operation.
 - i. The average hourly organic compound emission rate for all coatings, in pounds per hour (f/h).
 - j. A record of each liquid organic cleanup material employed in emissions unit P002 indicating whether or not the liquid organic material is photochemically reactive as defined in OAC rule 3745-21-01(C)(5).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

2. The permittee shall collect and record the following information for each month for emissions unit P005:
 - a. The total number of gallons of cleanup material employed each month.
 - b. The organic compound content of the cleanup material, in pounds per gallon.
 - c. The monthly Acetone (OC) emissions from cleanup materials (a x b).
3. In order to determine compliance with the group annual OC emission limit, the permittee shall maintain monthly records of the following information for emissions units: P002 through P005, P030, P031, P033 and P034.
 - a. The company identification for each coating (neat resin) employed in each emissions unit.
 - b. The number of pounds of each coating material employed in each emissions unit.
 - c. The percent styrene of each coating employed in each emissions unit.
 - d. The total organic compound emission rate for all coatings, in pounds per month.
 - e. The rolling, 12-month summation of the total coating usage figures for emissions units P002 through P005, P030, P031, P033 and P034.
 - f. The rolling, 12-month summation of the OC emissions for emissions units P002 through P005, P030, P031, P033 and P034.

The permittee already has existing coating usage records, therefore cumulative coating usage records are not needed for the first year.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the daily and/or hourly emissions limitations in T&C A.I.1.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the usage limitations in T&C A.II.1.
3. The permittee shall submit deviation (excursion) reports which identify an exceedance of the OC content limitation in T&C A.II.3.
4. The permittee shall submit a deviation (excursion) report which identifies an exceedance of the annual Acetone (OC) emissions limit for cleanup materials.
5. The permittee shall submit quarterly reports which specify the total organic compound emissions from emissions units P002 through P005, P030, P031, P033 and P034, combined for each calendar

month. These reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and cover the previous three calendar months.

6. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive cleanup material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
7. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the OC emission limitations, from coatings, for emissions unit P005 shall be demonstrated by the following:
 - a. Emission Factor: AP-42 Table 4.4-2
 - b. $\text{\#/hr OC emissions} = \text{\#/day OC emissions} \div \text{hours of operation}$
 - c. $\text{\#/day OC emissions} = \text{\# resin/day} \times \% \text{ styrene} \times \text{emission factor}$
 - d. $\text{Ton/yr OC emissions} = \text{Ton resin/yr} \times \% \text{ styrene} \times \text{emission factor}$

* Based on a rolling 12-month summation.

2. Compliance with the Acetone (OC) emissions limitations, from cleanup materials, for emissions unit P005 shall be demonstrated by the recordkeeping in T&C A.III. 1 and 2.
3. Compliance with the usage restrictions in T&C A.II.1 shall be demonstrated by the recordkeeping in T&C A.III.1 and 2.
4. Compliance with the annual group emissions limit in A.I.2.b. shall be demonstrated by the recordkeeping in T&C A.III.3 and the equation in term A.V.1.d.

VI. Miscellaneous Requirements

1. Per an electronic mail from Keith Barnett of USEPA dated September 26, 2001, there are no control requirements for RTM units in the proposed MACT.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P005 - RTM Pump 4 Bldg B		See Term B. III. 1.

2. **Additional Terms and Conditions**

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. 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 Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s) from emissions units: P002-P006, P013-P017, P021, P025-P041.

Pollutant: Styrene

TLV (ug/m3): 85,000

Total Maximum Hourly Emission Rate for all styrene emitting emissions units (lbs/hr): 125.5

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1857

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 2029

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics 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 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.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied with 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.
- The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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 it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P006 - RTM Pump 1 Main Bldg	OAC rule 3745-31-05(A)(3)	5.0 lbs/hr OC from coatings 40.0 lbs/day OC from coatings 19.8 lbs/day Acetone (OC) emissions from cleanup materials 2.98 TPY Acetone (OC) emissions from cleanup materials The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-31-28.
	OAC rule 3745-31-05(D)	See term A.I.2.b.
	OAC rule 3745-21-07(G)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-28	The requirements of this rule are satisfied by the requirements established in accordance with OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the cleanup material usage limits, OC emission limitations and compliance with the Air Toxics Policy.
- 2.b The annual OC emission limit, from coatings in emissions units: P006, P013 through P017, P021, P027, P028, P032 and P035, combined shall not exceed 20.0 TPY, based on a rolling, 12-month summation.

II. Operational Restrictions

1. The amount of cleanup material used in emissions unit P006 shall not exceed 3.0 gallons/day and 900 gallons/year.
2. The permittee shall employ nonphotochemically reactive cleanup materials in emissions unit P006.
3. The permittee shall employ cleanup materials in emissions unit P006 which have a maximum OC content of 6.6 pounds of OC per gallon, as applied.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for emissions unit P006:
 - a. The company identification for each coating (neat resin) and cleanup material employed.
 - b. The number of pounds of each coating material employed.
 - c. The percent styrene of each coating employed in each emissions unit.
 - d. The number of gallons of cleanup material employed.
 - e. The organic compound content of the cleanup material, in pounds per gallon.
 - f. The total organic compound emission rate for all coatings, in pounds per day.
 - g. The daily emissions from cleanup materials (d x e).
 - h. The total number of hours the emissions unit was in operation.
 - i. The average hourly organic compound emission rate for all coatings, in pounds per hour (f/h).
 - j. A record of each liquid organic cleanup material employed in emissions unit P006 indicating whether or not the liquid organic material is photochemically reactive as defined in OAC rule 3745-21-01(C)(5).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

2. The permittee shall collect and record the following information for each month for emissions unit P006:

- a. The total number of gallons of cleanup material employed each month.
 - b. The organic compound content of the cleanup material, in pounds per gallon.
 - c. The monthly Acetone (OC) emissions from cleanup materials (a x b).
3. In order to determine compliance with the group annual OC emission limit, the permittee shall maintain monthly records of the following information for emissions units: P006, P013 through P017, P021, P027, P028 P032 and P035 .
- a. The company identification for each coating (neat resin) employed in each emissions unit.
 - b. The number of pounds of each coating material employed in each emissions unit.
 - c. The percent styrene of each coating employed in each emissions unit.
 - d. The total organic compound emission rate for all coatings, in pounds per month.
 - e. The rolling, 12-month summation of the total coating usage figures for emissions units P006, P013 through P017, P021, P027, P028 P032 and P035.
 - f. The rolling, 12-month summation of the OC emissions for emissions units P006, P013 through P017, P021, P027, P028, P032 and P035 .

The permittee already has existing coating usage records, therefore cumulative coating usage records are not needed for the first year.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the daily and/or hourly emissions limitations in T&C A.I.1.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the usage limitations in T&C A.II.1.
3. The permittee shall submit deviation (excursion) reports which identify an exceedance of the OC content limitation in T&C A.II.3.
4. The permittee shall submit a deviation (excursion) report which identifies an exceedance of the annual Acetone (OC) emissions limit from cleanup materials.
5. The permittee shall submit quarterly reports which specify the total organic compound emissions from emissions units P006, P013 through P017, P021, P027, P028 P032 and P035, combined for each calendar month. These reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and cover the previous three calendar months.

6. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive cleanup material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
7. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the OC emission limitations, from coatings, for emissions unit P006 shall be demonstrated by the following:
 - a. Emission Factor: AP-42 Table 4.4-2
 - b. $\text{\#/hr OC emissions} = \text{\#/day OC emissions} \div \text{hours of operation}$
 - c. $\text{\#/day OC emissions} = \text{\# resin/day} \times \% \text{ styrene} \times \text{emission factor}$
 - d. $\text{Ton/yr OC emissions} = \text{Ton resin/yr} \times \% \text{ styrene} \times \text{emission factor}$

* Based on a rolling 12-month summation.

2. Compliance with the Acetone (OC) emissions limitations, from cleanup materials, for emissions unit P006 shall be demonstrated by the recordkeeping in T&C A.III. 1 and 2.
3. Compliance with the usage restrictions in T&C A.II.1 shall be demonstrated by the recordkeeping in T&C A.III.1 and 2.
4. Compliance with the annual group emissions limit in A.I.2.b. shall be demonstrated by the recordkeeping in T&C A.III.3 and the equation in term A.V.1.d.

VI. Miscellaneous Requirements

1. Per an electronic mail from Keith Barnett of USEPA dated September 26, 2001, there are no control requirements for RTM units in the proposed MACT.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P006 - RTM Pump 1 Main Bldg		See Term B. III. 1.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. 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 Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s) from emissions units: P002-P006, P013-P017, P021, P025-P041.

Pollutant: Styrene

TLV (ug/m3): 85,000

Total Maximum Hourly Emission Rate for all styrene emitting emissions units (lbs/hr): 125.5

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1857

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 2029

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics 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 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.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied with 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.
- The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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 it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P013 - RTM Pump 2 Main Bldg	OAC rule 3745-31-05(A)(3)	5.0 lbs/hr OC from coatings 40.0 lbs/day OC from coatings 19.8 lbs/day Acetone (OC) from cleanup materials 2.97 TPY Acetone (OC) from cleanup materials The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-31-28.
	OAC rule 3745-31-05(D)	See term A.I.2.b.
	OAC rule 3745-21-07(G)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-28	The requirements of this rule are satisfied by the requirements established in accordance with OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the cleanup material usage limits, OC emission limitations and compliance with the Air Toxics Policy.
- 2.b The annual OC emission limit, from coatings in emissions units: P006, P013 through P017, P021, P027, P028, P032 and P035, combined shall not exceed 20.0 TPY, based on a rolling, 12-month summation.

II. Operational Restrictions

1. The amount of cleanup material used in emissions unit P013 shall not exceed 3.0 gallons/day and 900 gallons/year.
2. The permittee shall employ nonphotochemically reactive cleanup materials in emissions unit P013.
3. The permittee shall employ cleanup materials in emissions unit P013 which have a maximum OC content of 6.6 pounds of OC per gallon, as applied.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for emissions unit P013:
 - a. The company identification for each coating (neat resin) and cleanup material employed.
 - b. The number of pounds of each coating material employed.
 - c. The percent styrene of each coating employed in each emissions unit.
 - d. The number of gallons of cleanup material employed.
 - e. The organic compound content of the cleanup material, in pounds per gallon.
 - f. The total organic compound emission rate for all coatings, in pounds per day.
 - g. The daily emissions from cleanup materials (d x e).
 - h. The total number of hours the emissions unit was in operation.
 - i. The average hourly organic compound emission rate for all coatings, in pounds per hour (f/h).
 - j. A record of each liquid organic cleanup material employed in emissions unit P013 indicating whether or not the liquid organic material is photochemically reactive as defined in OAC rule 3745-21-01(C)(5).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

2. The permittee shall collect and record the following information for each month for emissions unit P013:
 - a. The total number of gallons of cleanup material employed each month.

- b. The organic compound content of the cleanup material, in pounds per gallon.
 - c. The monthly Acetone (OC) emissions from cleanup materials (a x b).
3. In order to determine compliance with the group annual OC emission limit, the permittee shall maintain monthly records of the following information for emissions units: P006, P013 through P017, P021, P027, P028, P032 and P035 .
- a. The company identification for each coating (neat resin) employed in each emissions unit.
 - b. The number of pounds of each coating material employed in each emissions unit.
 - c. The percent styrene of each coating employed in each emissions unit.
 - d. The total organic compound emission rate for all coatings, in pounds per month.
 - e. The rolling ,12-month summation of the total coating usage figures for emissions units P006, P013 through P017, P021, P027, P028, P032 and P035.
 - f. The rolling, 12-month summation of the OC emissions for emissions units P006, P013 through P017, P021, P027, P028, P032 and P035 .

The permittee already has existing coating usage records, therefore cumulative coating usage records are not needed for the first year.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the daily and/or hourly emissions limitations in T&C A.I.1.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the usage limitations in T&C A.II.1.
3. The permittee shall submit deviation (excursion) reports which identify an exceedance of the OC content limitation in T&C A.II.3.
4. The permittee shall submit a deviation (excursion) report which identifies an exceedance of the annual Acetone (OC) emissions limit from cleanup materials.
5. The permittee shall submit quarterly reports which specify the total organic compound emissions from emissions units P006, P013 through P017, P021, P027, P028, P032 and P035, combined for each calendar month. These reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and cover the previous three calendar months.
6. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive cleanup material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. The notification shall include a

copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

7. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the OC emission limitations, from coatings, for emissions unit P013 shall be demonstrated by the following:
 - a. Emission Factor: AP-42 Table 4.4-2
 - b. $\text{\#/hr OC emissions} = \text{\#/day OC emissions} \div \text{hours of operation}$
 - c. $\text{\#/day OC emissions} = \text{\# resin/day} \times \% \text{ styrene} \times \text{emission factor}$
 - d. $\text{Ton/yr OC emissions} = \text{Ton resin/yr} \times \% \text{ styrene} \times \text{emission factor}$

* Based on a rolling 12-month summation.

2. Compliance with the Acetone (OC) emissions limitations, from cleanup materials, for emissions unit P013 shall be demonstrated by the recordkeeping in T&C A.III. 1 and 2.
3. Compliance with the usage restrictions in T&C A.II.1 shall be demonstrated by the recordkeeping in T&C A.III.1 and 2.
4. Compliance with the annual group emissions limit in A.I.2.b. shall be demonstrated by the recordkeeping in T&C A.III.3 and the equation in term A.V.1.d.

VI. Miscellaneous Requirements

1. Per an electronic mail from Keith Barnett of USEPA dated September 26, 2001, there are no control requirements for RTM units in the proposed MACT.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P013 - RTM Pump 2 Main Bldg		See Term B. III. 1.

2. **Additional Terms and Conditions**

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit P013 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 Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s) from emissions units: P002-P006, P013-P017, P021, P025-P041.

Pollutant: Styrene

TLV (ug/m3): 85,000

Total Maximum Hourly Emission Rate for all styrene emitting emissions units (lbs/hr): 125.5

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1857

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 2029

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics 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 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.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied with 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.
- The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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 it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P014 - RTM Pump 3 Main Bldg	OAC rule 3745-31-05(A)(3)	1.5 lbs/hr OC from coatings 40.0 lbs/day OC from coatings 19.8 lbs/day Acetone (OC) from cleanup materials 2.97 TPY Acetone (OC) from cleanup materials The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
	OAC rule 3745-31-05(D)	See term A.I.2.b.
	OAC rule 3745-21-07(G)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the cleanup material usage limits, OC emission limitations and compliance with the Air Toxics Policy.
- 2.b The annual OC emission limit, from coatings in emissions units: P006, P013 through P017, P021, P027, P028, P032 and P035, combined shall not exceed 20.0 TPY, based on a rolling, 12-month summation.

II. Operational Restrictions

1. The amount of cleanup material used in emissions unit P014 shall not exceed 3.0 gallons/day and 900 gallons/year.

2. The permittee shall employ nonphotochemically reactive cleanup materials in emissions unit P014.
3. The permittee shall employ cleanup materials in emissions unit P014 which have a maximum OC content of 6.6 pounds of OC per gallon, as applied.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for emissions unit P014:
 - a. The company identification for each coating (neat resin) and cleanup material employed.
 - b. The number of pounds of each coating material employed.
 - c. The percent styrene of each coating employed in each emissions unit.
 - d. The number of gallons of cleanup material employed.
 - e. The organic compound content of the cleanup material, in pounds per gallon.
 - f. The total organic compound emission rate for all coatings, in pounds per day.
 - g. The daily emissions from cleanup materials (d x e).
 - h. The total number of hours the emissions unit was in operation.
 - i. The average hourly organic compound emission rate for all coatings, in pounds per hour (f/h).
 - j. A record of each liquid organic cleanup material employed in emissions unit P014 indicating whether or not the liquid organic material is photochemically reactive as defined in OAC rule 3745-21-01(C)(5).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

2. The permittee shall collect and record the following information for each month for emissions unit P014:
 - a. The total number of gallons of cleanup material employed each month.
 - b. The organic compound content of the cleanup material, in pounds per gallon.
 - c. The monthly Acetone (OC) emissions from cleanup materials (a x b).

3. In order to determine compliance with the group annual OC emission limit, the permittee shall maintain monthly records of the following information for emissions units: P006, P013 through P017, P021, P027, P028, P032 and P035 .
 - a. The company identification for each coating (neat resin) employed in each emissions unit.
 - b. The number of pounds of each coating material employed in each emissions unit.
 - c. The percent styrene of each coating employed in each emissions unit.
 - d. The total organic compound emission rate for all coatings, in pounds per month.
 - e. The rolling, 12-month summation of the total coating usage figures for emissions units P006, P013 through P017, P021, P027, P028, P032 and P035.
 - f. The rolling, 12-month summation of the OC emissions for emissions units P006, P013 through P017, P021, P027, P028, P032 and P035 .

The permittee already has existing coating usage records, therefore cumulative coating usage records are not needed for the first year.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the daily and/or hourly emissions limitations in T&C A.I.1.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the usage limitations in T&C A.II.1.
3. The permittee shall submit deviation (excursion) reports which identify an exceedance of the OC content limitation in T&C A.II.3.
4. The permittee shall submit a deviation (excursion) report which identifies an exceedance of the annual Acetone (OC) emissions limit from cleanup materials.
5. The permittee shall submit quarterly reports which specify the total organic compound emissions from emissions units P006, P013 through P017, P021, P027, P028, P032 and P035, combined for each calendar month. These reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and cover the previous three calendar months.
6. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive cleanup material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

7. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the OC emission limitations, from coatings, for emissions unit P014 shall be demonstrated by the following:
 - a. Emission Factor: AP-42 Table 4.4-2
 - b. $\text{\#/hr OC emissions} = \text{\#/day OC emissions} \div \text{hours of operation}$
 - c. $\text{\#/day OC emissions} = \text{\# resin/day} \times \% \text{ styrene} \times \text{emission factor}$
 - d. $\text{Ton/yr OC emissions} = \text{Ton resin/yr}^* \times \% \text{ styrene} \times \text{emission factor}$

* Based on a rolling 12-month summation.
2. Compliance with the Acetone (OC) emissions limitations, from cleanup materials, for emissions unit P014 shall be demonstrated by the recordkeeping in T&C A.III. 1 and 2.
3. Compliance with the usage restrictions in T&C A.II.1 shall be demonstrated by the recordkeeping in T&C A.III.1 and 2.
4. Compliance with the annual group emissions limit in A.I.2.b. shall be demonstrated by the recordkeeping in T&C A.III.3 and the equation in term A.V.1.d.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P014 - RTM Pump 3 Main Bldg		See Term B. III. 1.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit P014 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 Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the “worst case” pollutant(s) from emissions units: P002-P006, P013-P017, P021, P025-P041.

Pollutant: Styrene

TLV (ug/m3): 85,000

Total Maximum Hourly Emission Rate for all styrene emitting emissions units (lbs/hr): 125.5

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1857

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 2029

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics 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 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.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied with 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.
- The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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 it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P015 - Clam Shell Mold 1	OAC rule 3745-31-05(A)(3)	2.0 lbs/hr OC from coatings 40.0 lbs/day OC from coatings 19.8 lbs/day Acetone (OC) from cleanup materials 2.97 TPY Acetone (OC) from cleanup materials The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
	OAC rule 3745-31-05(D)	See term A.I.2.b.
	OAC rule 3745-21-07(G)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the cleanup material usage limits, OC emission limitations and compliance with the Air Toxics Policy.
- 2.b The annual OC emission limit, from coatings in emissions units: P006, P013 through P017, P021, P027, P028, P032 and P035, combined shall not exceed 20.0 TPY, based on a rolling, 12-month summation.

II. Operational Restrictions

1. The amount of cleanup material used in emissions unit P015 shall not exceed 3.0 gallons/day and 900 gallons/year.

2. The permittee shall employ nonphotochemically reactive cleanup materials in emissions unit P015.
3. The permittee shall employ cleanup materials in emissions unit P015 which have a maximum OC content of 6.6 pounds of OC per gallon, as applied.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for emissions unit P015:
 - a. The company identification for each coating (neat resin) and cleanup material employed.
 - b. The number of pounds of each coating material employed.
 - c. The percent styrene of each coating employed in each emissions unit.
 - d. The number of gallons of cleanup material employed.
 - e. The organic compound content of the cleanup material, in pounds per gallon.
 - f. The total organic compound emission rate for all coatings, in pounds per day.
 - g. The daily emissions from cleanup materials (d x e).
 - h. The total number of hours the emissions unit was in operation.
 - i. The average hourly organic compound emission rate for all coatings, in pounds per hour (f/h).
 - j. A record of each liquid organic cleanup material employed in emissions unit P015 indicating whether or not the liquid organic material is photochemically reactive as defined in OAC rule 3745-21-01(C)(5).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

2. The permittee shall collect and record the following information for each month for emissions unit P015:
 - a. The total number of gallons of cleanup material employed each month.
 - b. The organic compound content of the cleanup material, in pounds per gallon.
 - c. The monthly Acetone (OC) emissions from cleanup materials (a x b).

3. In order to determine compliance with the group annual OC emission limit, the permittee shall maintain monthly records of the following information for emissions units: P006, P013 through P017, P021, P027, P028, P032 and P035 .
 - a. The company identification for each coating (neat resin) employed in each emissions unit.
 - b. The number of pounds of each coating material employed in each emissions unit.
 - c. The percent styrene of each coating employed in each emissions unit.
 - d. The total organic compound emission rate for all coatings, in pounds per month.
 - e. The rolling, 12-month summation of the total coating usage figures for emissions units P006, P013 through P017, P021, P027, P028, P032 and P035.
 - f. The rolling, 12-month summation of the OC emissions for emissions units P006, P013 through P017, P021, P027, P028, P032 and P035 .

The permittee already has existing coating usage records, therefore cumulative coating usage records are not needed for the first year.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the daily and/or hourly emissions limitations in T&C A.I.1.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the usage limitations in T&C A.II.1.
3. The permittee shall submit deviation (excursion) reports which identify an exceedance of the OC content limitation in T&C A.II.3.
4. The permittee shall submit a deviation (excursion) report which identifies an exceedance of the annual Acetone (OC) emissions limit from cleanup materials.
5. The permittee shall submit quarterly reports which specify the total organic compound emissions from emissions units P006, P013 through P017, P021, P027, P028, P032 and P035, combined for each calendar month. These reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and cover the previous three calendar months.
6. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive cleanup material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

7. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the OC emission limitations, from coatings, for emissions unit P015 shall be demonstrated by the following:
 - a. Emission Factor: AP-42 Table 4.4-2
 - b. $\text{\#/hr OC emissions} = \text{\#/day OC emissions} \div \text{hours of operation}$
 - c. $\text{\#/day OC emissions} = \text{\# resin/day} \times \% \text{ styrene} \times \text{emission factor}$
 - d. $\text{Ton/yr OC emissions} = \text{Ton resin/yr}^* \times \% \text{ styrene} \times \text{emission factor}$

* Based on a rolling 12-month summation.
2. Compliance with the Acetone (OC) emissions limitations, from cleanup materials, for emissions unit P015 shall be demonstrated by the recordkeeping in T&C A.III. 1 and 2.
3. Compliance with the usage restrictions in T&C A.II.1 shall be demonstrated by the recordkeeping in T&C A.III.1 and 2.
4. Compliance with the annual group emissions limit in T&C A.I.2.b. shall be demonstrated by the recordkeeping in T&C A.III.3 and the equation in term A.V.1.d.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P015 - Clam Shell Mold 1		See Term B. III. 1.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit P015 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 Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s) from emissions units: P002-P006, P013-P017, P021, P025-P041.

Pollutant: Styrene

TLV (ug/m3): 85,000

Total Maximum Hourly Emission Rate for all styrene emitting emissions units (lbs/hr): 125.5

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1857

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 2029

Physical changes to or 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 Toxics 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 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.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied with 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.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P016 - Clam Shell Mold 2	OAC rule 3745-31-05(A)(3)	2.0 lbs/hr OC from coatings 40.0 lbs/day OC from coatings 19.8 lbs/day Acetone (OC) from cleanup materials 2.97 TPY Acetone (OC) from cleanup materials The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
	OAC rule 3745-31-05(D)	See term A.I.2.b.
	OAC rule 3745-21-07(G)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the cleanup material usage limits, OC emission limitations and compliance with the Air Toxics Policy.
- 2.b The annual OC emission limit, from coatings in emissions units: P006, P013 through P017, P021, P027, P028, P032 and P035, combined shall not exceed 20.0 TPY, based on a rolling, 12-month summation.

II. Operational Restrictions

1. The amount of cleanup material used in emissions unit P016 shall not exceed 3.0 gallons/day and 900 gallons/year.

2. The permittee shall employ nonphotochemically reactive cleanup materials in emissions unit P016.
3. The permittee shall employ cleanup materials in emissions unit P016 which have a maximum OC content of 6.6 pounds of OC per gallon, as applied.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for emissions unit P016:
 - a. The company identification for each coating (neat resin) and cleanup material employed.
 - b. The number of pounds of each coating material employed.
 - c. The percent styrene of each coating employed in each emissions unit.
 - d. The number of gallons of cleanup material employed.
 - e. The organic compound content of the cleanup material, in pounds per gallon.
 - f. The total organic compound emission rate for all coatings, in pounds per day.
 - g. The daily emissions from cleanup materials (d x e).
 - h. The total number of hours the emissions unit was in operation.
 - i. The average hourly organic compound emission rate for all coatings, in pounds per hour (f/h).
 - j. A record of each liquid organic cleanup material employed in emissions unit P016 indicating whether or not the liquid organic material is photochemically reactive as defined in OAC rule 3745-21-01(C)(5).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

2. The permittee shall collect and record the following information for each month for emissions unit P016:
 - a. The total number of gallons of cleanup material employed each month.
 - b. The organic compound content of the cleanup material, in pounds per gallon.
 - c. The monthly Acetone (OC) emissions from cleanup materials (a x b).

3. In order to determine compliance with the group annual OC emission limit, the permittee shall maintain monthly records of the following information for emissions units: P006, P013 through P017, P021, P027, P028, P032 and P035 .
 - a. The company identification for each coating (neat resin) employed in each emissions unit.
 - b. The number of pounds of each coating material employed in each emissions unit.
 - c. The percent styrene of each coating employed in each emissions unit.
 - d. The total organic compound emission rate for all coatings, in pounds per month.
 - e. The rolling, 12-month summation of the total coating usage figures for emissions units P006, P013 through P017, P021, P027, P028 P032 and P035.
 - f. The rolling, 12-month summation of the OC emissions for emissions units P006, P013 through P017, P021, P027, P028, P032 and P035 .

The permittee already has existing coating usage records, therefore cumulative coating usage records are not needed for the first year.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the daily and/or hourly emissions limitations in T&C A.I.1.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the usage limitations in T&C A.II.1.
3. The permittee shall submit deviation (excursion) reports which identify an exceedance of the OC content limitation in T&C A.II.3.
4. The permittee shall submit a deviation (excursion) report which identifies an exceedance of the annual Acetone (OC) emissions limit from cleanup materials.
5. The permittee shall submit quarterly reports which specify the total organic compound emissions from emissions units P006, P013 through P017, P021, P027, P028 P032 and P035, combined for each calendar month. These reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and cover the previous three calendar months.
6. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive cleanup material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

7. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the OC emission limitations, from coatings, for emissions unit P016 shall be demonstrated by the following:
 - a. Emission Factor: AP-42 Table 4.4-2
 - b. $\text{\#/hr OC emissions} = \text{\#/day OC emissions} \div \text{hours of operation}$
 - c. $\text{\#/day OC emissions} = \text{\# resin/day} \times \% \text{ styrene} \times \text{emission factor}$
 - d. $\text{Ton/yr OC emissions} = \text{Ton resin/yr}^* \times \% \text{ styrene} \times \text{emission factor}$

* Based on a rolling 12-month summation.
2. Compliance with the Acetone (OC) emissions limitations, from cleanup materials, for emissions unit P016 shall be demonstrated by the recordkeeping in T&C A.III. 1 and 2.
3. Compliance with the usage restrictions in T&C A.II.1 shall be demonstrated by the recordkeeping in T&C A.III.1 and 2.
4. Compliance with the annual group emissions limit in T&C A.I.2.b. shall be demonstrated by the recordkeeping in T&C A.III.3 and the equation in term A.V.1.d.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P016 - Clam Shell Mold 2		See Term B. III. 1.

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit P016 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 Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s) from emissions units: P002-P006, P013-P017, P021, P025-P041.

Pollutant: Styrene

TLV (ug/m3): 85,000

Total Maximum Hourly Emission Rate for all styrene emitting emissions units (lbs/hr): 125.5

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1857

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 2029

Physical changes to or 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 Toxics 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 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.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied with 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.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P017 - Cold Molding Area	OAC rule 3745-31-05(A)(3)	2.0 lbs/hr OC from coatings 40.0 lbs/day OC from coatings 19.8 lbs/day Acetone (OC) from cleanup materials 2.97 TPY Acetone (OC) from cleanup materials The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
	OAC rule 3745-31-05(D)	See term A.I.2.b.
	OAC rule 3745-21-07(G)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the cleanup material usage limits, OC emission limitations and compliance with the Air Toxics Policy.
- 2.b The annual OC emission limit, from coatings in emissions units: P006, P013 through P017, P021, P027, P028 P032 and P035, combined shall not exceed 20.0 TPY, based on a rolling, 12-month summation.

II. Operational Restrictions

1. The amount of cleanup material used in emissions unit P017 shall not exceed 3.0 gallons/day and 900 gallons/year.

2. The permittee shall employ nonphotochemically reactive cleanup materials in emissions unit P017.
3. The permittee shall employ cleanup materials in emissions unit P017 which have a maximum OC content of 6.6 pounds of OC per gallon, as applied.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for emissions unit P017:
 - a. The company identification for each coating (neat resin) and cleanup material employed.
 - b. The number of pounds of each coating material employed.
 - c. The percent styrene of each coating employed in each emissions unit.
 - d. The number of gallons of cleanup material employed.
 - e. The organic compound content of the cleanup material, in pounds per gallon.
 - f. The total organic compound emission rate for all coatings, in pounds per day.
 - g. The daily emissions from cleanup materials (d x e).
 - h. The total number of hours the emissions unit was in operation.
 - i. The average hourly organic compound emission rate for all coatings, in pounds per hour (f/h).
 - j. A record of each liquid organic cleanup material employed in emissions unit P017 indicating whether or not the liquid organic material is photochemically reactive as defined in OAC rule 3745-21-01(C)(5).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

2. The permittee shall collect and record the following information for each month for emissions unit P017:
 - a. The total number of gallons of cleanup material employed each month.
 - b. The organic compound content of the cleanup material, in pounds per gallon.
 - c. The monthly Acetone (OC) emissions from cleanup materials (a x b).

3. In order to determine compliance with the group annual OC emission limit, the permittee shall maintain monthly records of the following information for emissions units: P006, P013 through P017, P021, P027, P028 P032 and P035 .
 - a. The company identification for each coating (neat resin) employed in each emissions unit.
 - b. The number of pounds of each coating material employed in each emissions unit.
 - c. The percent styrene of each coating employed in each emissions unit.
 - d. The total organic compound emission rate for all coatings, in pounds per month.
 - e. The rolling, 12-month summation of the total coating usage figures for emissions units P006, P013 through P017, P021, P027, P028 P032 and P035.
 - f. The rolling, 12-month summation of the OC emissions for emissions units P006, P013 through P017, P021, P027, P028 P032 and P035 .

The permittee already has existing coating usage records, therefore cumulative coating usage records are not needed for the first year.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the daily and/or hourly emissions limitations in T&C A.I.1.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the usage limitations in T&C A.II.1.
3. The permittee shall submit deviation (excursion) reports which identify an exceedance of the OC content limitation in T&C A.II.3.
4. The permittee shall submit a deviation (excursion) report which identifies an exceedance of the annual Acetone (OC) emissions limit from cleanup materials.
5. The permittee shall submit quarterly reports which specify the total organic compound emissions from emissions units P006, P013 through P017, P021, P027, P028 P032 and P035, combined for each calendar month. These reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and cover the previous three calendar months.
6. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive cleanup material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

7. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the OC emission limitations, from coatings, for emissions unit P017 shall be demonstrated by the following:
 - a. Emission Factor: AP-42 Table 4.4-2
 - b. $\text{\#/hr OC emissions} = \text{\#/day OC emissions} \div \text{hours of operation}$
 - c. $\text{\#/day OC emissions} = \text{\# resin/day} \times \% \text{ styrene} \times \text{emission factor}$
 - d. $\text{Ton/yr OC emissions} = \text{Ton resin/yr}^* \times \% \text{ styrene} \times \text{emission factor}$

* Based on a rolling 12-month summation.
2. Compliance with the Acetone (OC) emissions limitations, from cleanup materials, for emissions unit P017 shall be demonstrated by the recordkeeping in T&C A.III. 1 and 2.
3. Compliance with the usage restrictions in T&C A.II.1 shall be demonstrated by the recordkeeping in T&C A.III.1 and 2.
4. Compliance with the annual group emissions limit in A.I.2.b. shall be demonstrated by the recordkeeping in T&C A.III.3 and the equation in term A.V.1.d.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P017 - Cold Molding Area		See Term B. III. 1.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit P017 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 Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s) from emissions units: P002-P006, P013-P017, P021, P025-P041.

Pollutant: Styrene

TLV (ug/m3): 85,000

Total Maximum Hourly Emission Rate for all styrene emitting emissions units (lbs/hr): 125.5

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1857

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 2029

Physical changes to or 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 Toxics 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 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.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied with 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.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P021 - RTM Pump 7 Main Bldg	OAC rule 3745-31-05(A)(3)	3.0 lbs/hr OC from coatings 40.0 lbs/day OC from coatings 19.8 lbs/day Acetone (OC) from cleanup materials 2.97 TPY Acetone (OC) from cleanup materials The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-31-28.
	OAC rule 3745-31-05(D)	See term A.I.2.b.
	OAC rule 3745-21-07(G)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-28	The requirements of this rule are satisfied by the requirements established in accordance with OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the cleanup material usage limits, OC emission limitations and compliance with the Air Toxics Policy.
- 2.b The annual OC emission limit, from coatings in emissions units: P006, P013 through P017, P021, P027, P028 P032 and P035, combined shall not exceed 20.0 TPY, based on a rolling, 12-month summation.

II. Operational Restrictions

1. The amount of cleanup material used in emissions unit P021 shall not exceed 3.0 gallons/day and 900 gallons/year.
2. The permittee shall employ nonphotochemically reactive cleanup materials in emissions unit P021.
3. The permittee shall employ cleanup materials in emissions unit P021 which have a maximum OC content of 6.6 pounds of OC per gallon, as applied.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for emissions unit P021:
 - a. The company identification for each coating (neat resin) and cleanup material employed.
 - b. The number of pounds of each coating material employed.
 - c. The percent styrene of each coating employed in each emissions unit.
 - d. The number of gallons of cleanup material employed.
 - e. The organic compound content of the cleanup material, in pounds per gallon.
 - f. The total organic compound emission rate for all coatings, in pounds per day.
 - g. The daily emissions from cleanup materials (d x e).
 - h. The total number of hours the emissions unit was in operation.
 - i. The average hourly organic compound emission rate for all coatings, in pounds per hour (f/h).
 - j. A record of each liquid organic cleanup material employed in emissions unit P021 indicating whether or not the liquid organic material is photochemically reactive as defined in OAC rule 3745-21-01(C)(5).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

2. The permittee shall collect and record the following information for each month for emissions unit P021:
 - a. The total number of gallons of cleanup material employed each month.

- b. The organic compound content of the cleanup material, in pounds per gallon.
 - c. The monthly Acetone (OC) emissions from cleanup materials (a x b).
3. In order to determine compliance with the group annual OC emission limit, the permittee shall maintain monthly records of the following information for emissions units: P006, P013 through P017, P021, P027, P028 P032 and P035 .
- a. The company identification for each coating (neat resin) employed in each emissions unit.
 - b. The number of pounds of each coating material employed in each emissions unit.
 - c. The percent styrene of each coating employed in each emissions unit.
 - d. The total organic compound emission rate for all coatings, in pounds per month.
 - e. The rolling, 12-month summation of the total coating usage figures for emissions units P006, P013 through P017, P021, P027, P028 P032 and P035.
 - f. The rolling, 12-month summation of the OC emissions for emissions units P006, P013 through P017, P021, P027, P028 P032 and P035 .

The permittee already has existing coating usage records, therefore cumulative coating usage records are not needed for the first year.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the daily and/or hourly emissions limitations in T&C A.I.1.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the usage limitations in T&C A.II.1.
3. The permittee shall submit deviation (excursion) reports which identify an exceedance of the OC content limitation in T&C A.II.3.
4. The permittee shall submit a deviation (excursion) report which identifies an exceedance of the annual Acetone (OC) emissions limit from cleanup materials.
5. The permittee shall submit quarterly reports which specify the total organic compound emissions from emissions units P006, P013 through P017, P021, P027, P028 P032 and P035, combined for each calendar month. These reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and cover the previous three calendar months.

6. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive cleanup material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
7. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the OC emission limitations, from coatings, for emissions unit P021 shall be demonstrated by the following:
 - a. Emission Factor: AP-42 Table 4.4-2
 - b. $\text{\#/hr OC emissions} = \text{\#/day OC emissions} \div \text{hours of operation}$
 - c. $\text{\#/day OC emissions} = \text{\# resin/day} \times \% \text{ styrene} \times \text{emission factor}$
 - d. $\text{Ton/yr OC emissions} = \text{Ton resin/yr} \times \% \text{ styrene} \times \text{emission factor}$

* Based on a rolling 12-month summation.

2. Compliance with the Acetone (OC) emissions limitations, from cleanup materials, for emissions unit P021 shall be demonstrated by the recordkeeping in T&C A.III. 1 and 2.
3. Compliance with the usage restrictions in T&C A.II.1 shall be demonstrated by the recordkeeping in T&C A.III.1 and 2.
4. Compliance with the annual group emissions limit in T&C A.I.2.b. shall be demonstrated by the recordkeeping in T&C A.III.3 and the equation in term A.V.1.d.

VI. Miscellaneous Requirements

1. Per an electronic mail from Keith Barnett of USEPA dated September 26, 2001, there are no control requirements for RTM units in the proposed MACT.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P021 - RTM Pump 7 Main Bldg		See Term B. III. 1.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit P021 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 Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s) from emissions units: P002-P006, P013-P017, P021, P025-P041.

Pollutant: Styrene

TLV (ug/m3): 85,000

Total Maximum Hourly Emission Rate for all styrene emitting emissions units (lbs/hr): 125.5

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1857

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 2029

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics 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 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.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied with 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.
- The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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 it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P025 - Main Gel Coat Spray Booth 2	OAC rule 3745-31-05(A)(3)	8.0 lbs/hr OC from coatings 40 lbs/day OC from coatings 3.3 lbs/day Acetone (OC) from cleanup materials 0.495 TPY Acetone (OC) from cleanup materials 0.28 lb/hr PM/PM10 1.38 lbs/day PM/PM10
	OAC rule 3745-31-05(D)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and OAC rule 3745-31-05(D) 7.0 TPY OC from coatings* 0.18 TPY PM/PM10*
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six minute average, except as specified by rule.
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

* Based on a rolling, 12-month summation.

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the cleanup material usage limits, OC emission limitations and compliance with the Air Toxics Policy.

II. Operational Restrictions

1. The amount of cleanup material used in emissions unit P025 shall not exceed 0.5 gallons/day and 150 gallons/year.
2. The permittee shall employ nonphotochemically reactive cleanup materials in emissions unit P025.
3. The permittee shall employ cleanup materials in emissions unit P025 which have a maximum OC content of 6.6 pounds of OC per gallon.
4. The permittee shall operate and maintain a filtering system to control particulate emissions from emissions unit P025.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for emissions unit P025:
 - a. The company identification for each gel coat and cleanup material employed.
 - b. The number of pounds of each gel coat material employed.
 - c. The percent styrene of each gel coat employed in each emissions unit.
 - d. The number of gallons of cleanup material employed.
 - e. The organic compound content of the cleanup material, in pounds per gallon.
 - f. The total organic compound emission rate for all gel coat, in pounds per day.
 - g. The daily emissions from cleanup materials (d x e).
 - h. The total number of hours the emissions unit was in operation.
 - i. The average hourly organic compound emission rate for all coatings, in pounds per hour (f)/(h).

- j. A record of each liquid organic cleanup material employed in emissions unit P025 indicating whether or not the liquid organic material is photochemically reactive as defined in OAC rule 3745-21-01(C)(5).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

2. The permittee shall maintain monthly records of the following information for emissions unit P025:
 - a. The total number of gallons of cleanup material employed each month.
 - b. The organic compound content of the cleanup material, in pounds per gallon.
 - c. The monthly Acetone (OC) emissions from cleanup materials (a x b).
 - d. The gel coat usage for each month.
 - e. The rolling, 12-month summation of the coating usage figures.
 - f. The rolling, 12-month summation of the OC emissions.

The permittee already has existing coating usage records, therefore cumulative coating usage records are not needed for the first year.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the daily and/or hourly emissions limitations in T&C A.I.1.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the usage limitations in T&C A.II.1.
3. The permittee shall submit deviation (excursion) reports which identify an exceedance of the OC content limitation in T&C A.II.3.
4. The permittee shall submit a deviation (excursion) report which identifies an exceedance of the annual Acetone (OC) emissions limit from cleanup materials.
5. The permittee shall submit quarterly reports which specify the total organic compound emissions from this emissions unit for each calendar month. These reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and cover the previous three calendar months.
6. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive cleanup material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

7. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the visible particulate emissions limitation shall be demonstrated by Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources,").
2. Compliance with the OC emission limitations for emissions unit P025 shall be demonstrated by multiplying the amount of gel coat used by the appropriate emission factor found in the Unified Emission Factor (UEF) Table from "The Technical Discussion of the Unified Emission Factors for Open Molding of Composites" (dated July 23, 2001 or the most recent update) as follows:
 - a. $\text{\#/hr OC emissions} = \text{\#/day OC emissions} \text{ divided by the hours of operation}$
 - b. $\text{\#/day OC emissions} = \text{\# gel coat/day} \times \text{emission factor} \times \text{Ton/2000\#}$
 - c. $\text{Ton/yr OC emissions} = \text{Ton gel coat/yr} \times \text{emission factor} \times \text{Ton/2000\#}$

* Based on a rolling, 12-month summation.
3. Compliance with the usage restrictions in T&C A.II.1 shall be demonstrated by the recordkeeping in T&C A.III.1 and 2.
4. Compliance with the OC emission limit in T&C A.I.1 shall be demonstrated by the recordkeeping in T&C A.III.2 and the equation in term A.V.2.c.
5. Compliance with the OC content limit in T&C A.II.3 shall be demonstrated by the recordkeeping in T&C A.III.2.
6. Compliance with the particulate emission rate shall be demonstrated by the following:
 - a. $\text{Lbs/hr.} = \text{\# gel coat/hr} \times (1 - \text{volatile content, percent by weight}) \times (1 - .75 \text{ overspray control}) \times (1 - .985 \text{ Control efficiency}).$
 - b. $\text{Lbs/hr.} = \text{\# gel coat/day} \times (1 - \text{volatile content, percent by weight}) \times (1 - .75 \text{ overspray control}) \times (1 - .985 \text{ Control efficiency}).$
 - b. $\text{TPY} = \text{\# gel coat/year} \times (1 - \text{volatile content, percent by weight}) \times (1 - .75 \text{ overspray control}) \times (1 - .985 \text{ Control efficiency}) \times \text{ton/2000 lbs.}$

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P025 - Main Gel Coat Spray Booth 2		See Term B. III. 1.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit P025 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 Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s) from emissions units: P002-P006, P013-P017, P021, P025-P041.

Pollutant: Styrene

TLV (ug/m3): 85,000

Total Maximum Hourly Emission Rate for all styrene emitting emissions units (lbs/hr): 125.5

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1857

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 2029

Physical changes to or 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 Toxics 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 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.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied with 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.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P027 - Service Gel Coat 2 Main Bldg	OAC rule 3745-31-05	8.0 lbs/hr OC from coatings 40 lbs/day OC from coatings 3.3 lbs/day Acetone (OC) from cleanup materials 0.495 TPY Acetone (OC) from cleanup materials 0.28 lb/hr PM/PM10 1.38 lbs/day PM/PM10
	OAC rule 3745-31-05(D)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-07(A)(1). See term A.I.2.b. 0.24 TPY PM/PM10*
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six minute average, except as specified by rule.
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

| *Based on a rolling, 12-month summation

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the cleanup material usage limits, OC emission limitations and compliance with the Air Toxics Policy.
- 2.b The annual OC emission limit, from coatings (resins and gel coats), employed in emissions units P006, P013 through P017, P021, P027, P028 P032 and P035, combined shall not exceed 20.0 TPY based on a rolling, 12-month summation.

II. Operational Restrictions

- 1. The amount of cleanup material used in emissions unit P027 shall not exceed 0.5 gallons/day and 150 gallons/year.
- 2. The permittee shall employ nonphotochemically reactive cleanup materials in emissions unit P027.
- 3. The permittee shall employ cleanup materials in emissions unit P027 which have a maximum OC content of 6.6 pounds of OC per gallon, as applied.
- 4. The permittee shall operate and maintain a filtering system to control particulate emissions from emissions unit P027.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall collect and record the following information for each day for emissions unit P027:
 - a. The company identification for each gel coat and cleanup material employed.
 - b. The number of pounds of each gel coat material employed.
 - c. The percent styrene of each gel coat employed in each emissions unit.
 - d. The number of gallons of cleanup material employed.
 - e. The organic compound content of the cleanup material, in pounds per gallon.
 - f. The total organic compound emission rate for all gel coat, in pounds per day.
 - g. The daily emissions from cleanup materials (d x e).
 - h. The total number of hours the emissions unit was in operation.
 - i. The average hourly organic compound emission rate for all gel coats, in pounds per hour (f)/(h).

- j. A record of each liquid organic cleanup material employed in emissions unit P027 indicating whether or not the liquid organic material is photochemically reactive as defined in OAC rule 3745-21-01(C)(5).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

2. The permittee shall collect and record the following information for each month for emissions unit P027:
 - a. The total number of gallons of cleanup material employed each month.
 - b. The organic compound content of the cleanup material, in pounds per gallon.
 - c. The monthly Acetone (OC) emissions from cleanup materials (a x b).
3. In order to determine compliance with the group annual OC emission limit, the permittee shall maintain monthly records of the following information for emissions units: P006, P013 through P017, P021, P027, P028 P032 and P035.
 - a. The company identification for each coating or gel coat (neat resin) employed in each emissions unit.
 - b. The number of pounds of each coating or gel coat material employed in each emissions unit.
 - c. The percent styrene of each coating or gel coat employed in each emissions unit.
 - d. The total organic compound emission rate for all coatings and gel coats, in pounds per month.
 - e. The rolling, 12-month summation of the total coating and gel coat usage figures for all emissions units in the group.
 - f. The rolling, 12-month summation of the OC emissions for all emissions units in the group.

The permittee already has existing coating usage records, therefore cumulative coating usage records are not needed for the first year.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the daily and/or hourly emissions limitations in T&C A.I.1.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the usage limitations in T&C A.II.1.

3. The permittee shall submit deviation (excursion) reports which identify an exceedance of the OC content limitation in T&C A.II.3.
4. The permittee shall submit a deviation (excursion) report which identifies an exceedance of the annual Acetone (OC) emissions limit from cleanup materials.
5. The permittee shall submit quarterly reports which specify the total organic compound emissions from emissions units P006, P013 through P017, P021, P027, P028 P032 and P035, combined for each calendar month. These reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and cover the previous three calendar months.
6. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive cleanup material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
7. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the visible particulate emissions limitation shall be demonstrated by Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources,").
2. Compliance with the OC emission limitations for emissions unit P027 shall be demonstrated by multiplying the amount of gel coat used by the appropriate emission factor found in the Unified Emission Factor (UEF) Table from "The Technical Discussion of the Unified Emission Factors for Open Molding of Composites" (dated July 23, 2001 or the most recent update) as follows:
 - a. $\text{\#/hr OC emissions} = \text{\#/day OC emissions} \text{ divided by the hours of operation}$
 - b. $\text{\#/day OC emissions} = \text{\# gel coat/day} \times \text{emission factor} \times \text{Ton/2000\#}$
 - c. $\text{Ton/yr OC emissions} = \text{Ton gel coat/yr} \times \text{emission factor} \times \text{Ton/2000\#}$

* Based on a rolling, 12-month summation.
3. Compliance with the usage restrictions in T&C A.II.1 shall be demonstrated by the recordkeeping in T&C A.III.1. and A.III.2.

4. Compliance with the Acetone (OC) emissions limitations, from cleanup materials, for emissions unit P027 shall be demonstrated by the recordkeeping in T&C A.III. 1 and A.III.2.
5. Compliance with the OC emission limit in T&CA.I.2. b. shall be demonstrated by the recordkeeping in T&C A.III.3 and the equation in term A.V.1.c.
6. Compliance with the particulate emission rate shall be demonstrated by the following:
 - a. $\text{Lbs/hr.} = \# \text{ gel coat/hr} \times (1 - \text{volatile content, percent by weight}) \times (1 - .75 \text{ overspray control}) \times (1 - .985 \text{ Control efficiency})$.
 - b. $\text{Lbs/hr.} = \# \text{ gel coat/day} \times (1 - \text{volatile content, percent by weight}) \times (1 - .75 \text{ overspray control}) \times (1 - .985 \text{ Control efficiency})$.
 - b. $\text{TPY} = \# \text{ gel coat/year} \times (1 - \text{volatile content, percent by weight}) \times (1 - .75 \text{ overspray control}) \times (1 - .985 \text{ Control efficiency}) \times \text{ton}/2000 \text{ lbs.}$
7. Compliance with T&C A.II.2 and A.II.3 shall be demonstrated by the recordkeeping in T&C A.III.1.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P027 - Service Gel Coat 2 Main Bldg		See Term B. III. 1.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit P027 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 Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the “worst case” pollutant(s) from emissions units: P002-P006, P013-P017, P021, P025-P041.

Pollutant: Styrene

TLV (ug/m3): 85,000

Total Maximum Hourly Emission Rate for all styrene emitting emissions units (lbs/hr): 125.5

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1857

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 2029

Physical changes to or 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 Toxics 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 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.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied with 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.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P028 - Service Gel Coat 3 Main Bldg	OAC rule 3745-31-05(A)(3)	8.0 lbs/hr OC from coatings 40 lbs/day OC from coatings 3.3 lbs/day Acetone (OC) from cleanup materials 0.495 TPY Acetone (OC) from cleanup materials 0.28 lb/hr PM/PM10 1.38 lbs/day PM/PM10
	OAC rule 3745-31-05(D)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1), 3745-31-05(D) and 3745-31-28. See term A.I.2.b. 0.06 TPY PM/PM10*
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six minute average, except as specified by rule.
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

OAC rule 3745-31-28

See Term A.I.2.c., A.II.3.

*Based on a rolling, 12-month summation

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the cleanup material usage limits, OC emission limitations and compliance with the Air Toxics Policy.
- 2.b The annual OC emission limit, from coatings (resins and gel coats), employed in emissions units: P006, P013 through P017, P021, P027, P028, P032 and P035, combined shall not exceed 20.0 TPY based on a rolling, 12-month summation.
- 2.c The permittee shall comply with the following emission limits in pounds of HAP (Hazardous Air Pollutants) per ton of gel coat for this emissions unit:

<u>Material</u>	<u>Limit</u>
Pigmented Production-White Gel Coat	267
Pigmented Production-Non-White Gel Coat	377
Clear Production Gel Coat	504

This limit may be based on a rolling, 12-month average.

II. Operational Restrictions

1. The amount of cleanup material used in emissions unit P028 shall not exceed 0.5 gallons/day and 150 gallons/year.
2. The permittee shall employ nonphotochemically reactive cleanup materials in emissions unit P028.
3. The permittee shall employ non-HAP containing cleanup materials in emissions unit P028.
4. The permittee shall employ cleanup materials in emissions unit P028 which have a maximum OC content of 6.6 pounds of OC per gallon, as applied.
5. The permittee shall operate and maintain a filtering system to control particulate emissions from emissions unit P028.
6. The permittee shall keep containers that store HAP materials closed or covered except during the addition or removal of materials.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for emissions unit P028:
 - a. The company identification for each gel coat and cleanup material employed.

- b. The number of pounds of each gel coat material employed.
- c. The percent styrene of each gel coat employed in each emissions unit.
- d. The number of gallons of cleanup material employed.
- e. The organic compound content of the cleanup material, in pounds per gallon.
- f. The total organic compound emission rate for all coatings, in pounds per day.
- g. The daily emissions from cleanup materials (d x e).
- h. The total number of hours the emissions unit was in operation.
- i. The average hourly organic compound emission rate for all gel coats, in pounds per hour (f/h).
- j. A record of each liquid organic cleanup material employed in emissions unit P028 indicating whether or not the liquid organic material is photochemically reactive as defined in OAC rule 3745-21-01(C)(5) or contains HAP's.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

2. The permittee shall collect and record the following information for each month for emissions unit P028:
 - a. The total number of gallons of cleanup material employed each month.
 - b. The organic compound content of the cleanup material, in pounds per gallon.
 - c. The monthly Acetone (OC) emissions from cleanup materials (a x b).
 - d. The average pounds of HAP per ton of gel coat for each material listed in term A.I.2.c.
 - e. The updated rolling, 12-month average pounds of HAP per ton of gel coat for each material listed in term A.I.2.c.
3. In order to determine compliance with the group annual OC emission limit, the permittee shall maintain monthly records of the following information for emissions units: P006, P013 through P017, P021, P027, P028 P032 and P035.

- a. The company identification for each coating or gel coat employed in each emissions unit.
- b. The number of pounds of each coating or gel coat material employed in each emissions unit.
- c. The percent styrene of each coating or gel coat employed in each emissions unit.
- d. The total organic compound emission rate for all coatings and gel coats, in pounds per month.
- e. The rolling, 12-month summation of the total coating and gel coat usage figures for all emissions units in the group.
- f. The rolling, 12-month summation of the OC emissions for all emissions units in the group.

The permittee already has existing coating usage records, therefore cumulative coating usage records are not needed for the first year.

4. The permittee shall maintain a certified statement that the permittee is in compliance with the work practice standard in T&C A.II.6.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the daily and/or hourly emissions limitations in T&C A.I.1.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the usage limitations in T&C A.II.1.
3. The permittee shall submit deviation (excursion) reports which identify an exceedance of the OC content limitation in T&C A.II.4.
4. The permittee shall submit a deviation (excursion) report which identifies an exceedance of the annual Acetone (OC) emissions limit from cleanup materials.
5. The permittee shall submit quarterly reports which specify the total organic compound emissions from emissions units P006, P013 through P017, P021, P027, P028 P032 and P035, combined for each calendar month. These reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and cover the previous three calendar months.
6. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive cleanup material [as defined in OAC rule 3745-21-01(C)(5)] and/or any HAP containing cleanup material was employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

7. The permittee shall submit deviation (excursion) reports which identify an exceedance of the HAP limitations in T&C A.I.2.c.
8. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the visible particulate emissions limitation shall be demonstrated by Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources,").
2. Compliance with the OC and HAP emission limitations for emissions unit P028 shall be demonstrated by multiplying the amount of gel coat used by the appropriate emission factor found in the Unified Emission Factor (UEF) Table from "The Technical Discussion of the Unified Emission Factors for Open Molding of Composites" (dated July 23, 2001 or the most recent update) as follows:
 - a. $\text{\#/hr OC emissions} = \text{\#/day OC emissions} \div \text{hours of operation}$
 - b. $\text{\#/day OC emissions} = \text{\# gel coat/day} \times \text{emission factor} \times \text{Ton/2000\#}$
 - c. $\text{Ton/yr OC emissions} = \text{Ton gel coat/yr} \times \text{emission factor} \times \text{Ton/2000\#}$

* Based on a rolling, 12-month summation.
3. Compliance with the usage restrictions in T&C A.II.1 shall be demonstrated by the recordkeeping in T&C A.III.1 and A.III.2.
4. Compliance with the Acetone (OC) emissions limitations, from cleanup materials, for emissions unit P028 shall be demonstrated by the recordkeeping in T&C A.III. 1 and 2.
5. Compliance with the OC emissions limit in T&C A.I.2.b. shall be demonstrated by the recordkeeping in T&C A.III.3 and the equation in term A.V.2.c.
6. Compliance with the HAP emissions limit in T&C A.I.2.c shall be demonstrated by the recordkeeping in T&C A.III.2 (see term V.2.).
7. Compliance with the particulate emission rate shall be demonstrated by the following:
 - a. $\text{Lbs/hr.} = \text{\# gel coat/hr} \times (1 - \text{volatile content, percent by weight}) \times (1 - .75 \text{ overspray control}) \times (1 - .985 \text{ Control efficiency}).$
 - b. $\text{Lbs/hr.} = \text{\# gel coat/day} \times (1 - \text{volatile content, percent by weight}) \times (1 - .75 \text{ overspray control}) \times (1 - .985 \text{ Control efficiency}).$

- b. $TPY = \# \text{ gel coat/year} \times (1 - \text{volatile content, percent by weight}) \times (1 - .75 \text{ overspray control}) \times (1 - .985 \text{ Control efficiency}) \times \text{ton/2000 lbs.}$
- 8. Compliance with T&C A.II.2 and A.II.3 shall be demonstrated by the recordkeeping in T&C A.III.1.
- 9. The gel coat HAP contents may be based on Material Safety Data Sheets or resin specification sheets.

VI. Miscellaneous Requirements

- 1. The MACT determination was based on a PowerPoint presentation from Keith Barnett of USEPA dated February 1, 2002.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P028 - Service Gel Coat 3 Main Bldg		See Term B. III. 1.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit P028 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 Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s) from emissions units: P002-P006, P013-P017, P021, P025-P041.

Pollutant: Styrene

TLV (ug/m3): 85,000

Total Maximum Hourly Emission Rate for all styrene emitting emissions units (lbs/hr): 125.5

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1857

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 2029

Physical changes to or 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 Toxics 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 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.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied with 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.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P030 - Service Gel Coat 1 Bldg B	OAC rule 3745-31-05(A)(3)	8.0 lbs/hr OC from coatings 40 lbs/day OC from coatings 3.3 lbs/day Acetone (OC) from cleanup materials 0.495 TPY Acetone (OC) from cleanup materials 0.28 lb/hr PM/PM10 1.38 lbs/day PM/PM10
	OAC rule 3745-31-05(D)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1), 3745-31-05(D) and 3745-31-28. See term A.I.2.b 0.06 TPY PM/PM10*
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six minute average, except as specified by rule.
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

OAC rule 3745-31-28

See term A.I.2.c, A.II.3

* Based on a rolling 12-month summation.

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the cleanup material usage limits, OC emission limitations and compliance with the Air Toxics Policy.
- 2.b The annual OC emission limit, from coatings (resins and gel coats), employed in emissions units P002 through P005, P030, P031, P033 and P034, combined shall not exceed 25.0 TPY based on a rolling, 12-month summation.
- 2.c The permittee shall comply with the following emission limits in pounds of HAP (Hazardous Air Pollutants) per ton of gel coat for this emissions unit:

<u>Material</u>	<u>Limit</u>
Pigmented Production-White Gel Coat	267
Pigmented Production-Non-White Gel Coat	377
Clear Production Gel Coat	504

This limit may be based on a rolling, 12-month average.

II. Operational Restrictions

1. The amount of cleanup material used in emissions unit P030 shall not exceed 0.5 gallons/day and 150 gallons/year.
2. The permittee shall employ nonphotochemically reactive cleanup materials in emissions unit P030.
3. The permittee shall employ non-HAP containing cleanup materials in emissions unit P030.
4. The permittee shall employ cleanup materials in emissions unit P030 which have a maximum OC content of 6.6 pounds of OC per gallon, as applied.
5. The permittee shall operate and maintain a filtering system to control particulate emissions from emissions unit P030.
6. The permittee shall keep containers that store HAP materials closed or covered except during the addition or removal of materials.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for emissions unit P030:
 - a. The company identification for each gel coat and cleanup material employed.

- b. The number of pounds of each gel coat material employed.
- c. The percent styrene of each gel coat employed in this emissions unit.
- d. The number of gallons of cleanup material employed.
- e. The organic compound content of the cleanup material, in pounds per gallon.
- f. The total organic compound emission rate for all gel coats, in pounds per day.
- g. The daily emissions from cleanup materials (d x e).
- h. The total number of hours the emissions unit was in operation.
- i. The average hourly organic compound emission rate for all gel coats, in pounds per hour (f/h).
- j. A record of each liquid organic cleanup material employed in emissions unit P030 indicating whether or not the liquid organic material is photochemically reactive as defined in OAC rule 3745-21-01(C)(5) or contains HAP's.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

2. The permittee shall collect and record the following information for each month for emissions unit P030:
 - a. The total number of gallons of cleanup material employed each month.
 - b. The organic compound content of the cleanup material, in pounds per gallon.
 - c. The monthly Acetone (OC) emissions from cleanup materials (a x b).
 - d. The average pounds of HAP per ton of gel coat for each material listed in term A.I.2.c.
 - e. The updated rolling, 12-month average pounds of HAP per ton of gel coat for each material listed in term A.I.2.c.
3. In order to determine compliance with the group annual OC emission limit, the permittee shall maintain monthly records of the following information for emissions units: P002 through P005, P030, P031, P033 and P034.
 - a. The company identification for each coating or gel coat employed in each emissions unit.

- b. The number of pounds of each coating or gel coat material employed in each emissions unit.
- c. The percent styrene of each coating or gel coat employed in each emissions unit.
- d. The total organic compound emission rate for all coatings and gel coats, in pounds per month.
- e. The rolling, 12-month summation of the total coating and gel coat usage figures for all emissions units in the group.
- f. The rolling, 12-month summation of the OC emissions for all emissions units in the group.

The permittee already has existing coating usage records, therefore cumulative coating usage records are not needed for the first year.

- 4. The permittee shall maintain a certified statement that the permittee is in compliance with the work practice standard in T&C A.II.6.

IV. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the daily and/or hourly emissions limitations in T&C A.I.1.
- 2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the usage limitations in T&C A.II.1.
- 3. The permittee shall submit deviation (excursion) reports which identify an exceedance of the OC content limitation in T&C A.II.4.
- 4. The permittee shall submit a deviation (excursion) report which identifies an exceedance of the annual OC emissions limit from cleanup materials.
- 5. The permittee shall submit quarterly reports which specify the total organic compound emissions from emissions units P002 through P005, P030, P031, P033 and P034, combined for each calendar month. These reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and cover the previous three calendar months.
- 6. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive cleanup material [as defined in OAC rule 3745-21-01(C)(5)] and/or any HAP containing cleanup material was employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
- 7. The permittee shall submit deviation (excursion) reports which identify an exceedance of the HAP limitations in T&C A.I.2.c.

8. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the visible particulate emissions limitation shall be demonstrated by Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources,").
2. Compliance with the OC and HAP emission limitations for emissions unit P030 shall be demonstrated by multiplying the amount of gel coat used by the appropriate emission factor found in the Unified Emission Factor (UEF) Table from "The Technical Discussion of the Unified Emission Factors for Open Molding of Composites" (dated July 23, 2001, or the most recent update) as follows:
 - a. $\#/\text{hr OC emissions} = \#/\text{day OC emissions divided by the hours of operation}$
 - b. $\#/\text{day OC emissions} = \# \text{ gel coat/day} \times \text{emission factor} \times \text{Ton}/2000\#$
 - c. $\text{Ton/yr OC emissions} = \text{Ton gel coat/yr}^* \times \text{emission factor} \times \text{Ton}/2000\#$

* Based on a rolling 12-month summation.
3. Compliance with the usage restrictions in T&C A.II.1 shall be demonstrated by the recordkeeping in T&C A.III.1 and A.III.2.
4. Compliance with the Acetone (OC) emissions limitations, from cleanup materials, for emissions unit P030 shall be demonstrated by the recordkeeping in T&C A.III. 1 and 2.
5. Compliance with the OC emissions limit in T&C A.I.2.b shall be demonstrated by the recordkeeping in T&C A.III.3 and the equation in term A.V.2.c.
6. Compliance with the HAP emissions limit in T&C A.I.2.c shall be demonstrated by the recordkeeping in T&C A.III.2 (see term V.2.).
7. Compliance with the particulate emission rate shall be demonstrated by the following:
 - a. $\text{Lbs/hr.} = \# \text{ gel coat/hr} \times (1 - \text{volatile content, percent by weight}) \times (1 - .75 \text{ overspray control}) \times (1 - .985 \text{ Control efficiency}).$
 - b. $\text{Lbs/hr.} = \# \text{ gel coat/day} \times (1 - \text{volatile content, percent by weight}) \times (1 - .75 \text{ overspray control}) \times (1 - .985 \text{ Control efficiency}).$
 - b. $\text{TPY} = \# \text{ gel coat/year} \times (1 - \text{volatile content, percent by weight}) \times (1 - .75 \text{ overspray control}) \times (1 - .985 \text{ Control efficiency}) \times \text{ton}/2000 \text{ lbs.}$

8. Compliance with T&C A.II.2 and A.II.3 shall be demonstrated by the recordkeeping in T&C A.III.1.
9. The gel coat HAP contents may be based on Material Safety Data Sheets or resin specification sheets.

VI. Miscellaneous Requirements

1. The MACT determination was based on a PowerPoint presentation from Keith Barnett of USEPA dated February 1, 2002.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P030 - Service Gel Coat 1 Bldg B		See Term B. III. 1.

2. **Additional Terms and Conditions**

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit P030 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 Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s) from emissions units: P002-P006, P013-P017, P021, P025-P041.

Pollutant: Styrene

TLV (ug/m3): 85,000

Total Maximum Hourly Emission Rate for all styrene emitting emissions units (lbs/hr): 125.5

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1857

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 2029

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics 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 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.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied with 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.
- The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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 it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P031 - Service Gel Coat 2 Bldg B	OAC rule 3745-31-05(A)(3)	8.0 lbs/hr OC from coatings 40 lbs/day OC from coatings 3.3 lbs/day Acetone (OC) from cleanup materials 0.495 TPY Acetone (OC) from cleanup materials 0.28 lb/hr PM/PM10 1.38 lbs/day PM/PM10
	OAC rule 3745-31-05(D)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-05(D) . See term A.I.2.b 0.06 TPY PM/PM10*
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six minute average, except as specified by rule.
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

| * Based on a rolling 12-month summation.

2. Additional Terms and Conditions

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the cleanup material usage limits, OC emission limitations and compliance with the Air Toxics Policy.
- 2.b** The annual OC emission limit, from coatings (resins and gel coats), employed in emissions units P002 through P005, P030, P031, P033 and P034, combined shall not exceed 25.0 TPY based on a rolling, 12-month summation.

II. Operational Restrictions

- 1. The amount of cleanup material used in emissions unit P031 shall not exceed 0.5 gallons/day and 150 gallons/year.
- 2. The permittee shall employ nonphotochemically reactive cleanup materials in emissions unit P031.
- 3. The permittee shall employ cleanup materials in emissions unit P031 which have a maximum OC content of 6.6 pounds of OC per gallon, as applied.
- 4. The permittee shall operate and maintain a filtering system to control particulate emissions from emissions unit P031.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall collect and record the following information for each day for emissions unit P031:
 - a. The company identification for each gel coat and cleanup material employed.
 - b. The number of pounds of each gel coat material employed.
 - c. The percent styrene of each gel coat employed in this emissions unit.
 - d. The number of gallons of cleanup material employed.
 - e. The organic compound content of the cleanup material, in pounds per gallon.
 - f. The total organic compound emission rate for all gel coat materials, in pounds per day.
 - g. The daily emissions from cleanup materials (d x e).
 - h. The total number of hours the emissions unit was in operation.

- i. The average hourly organic compound emission rate for all gel coats, in pounds per hour (f)/(h).
 - j. A record of each liquid organic cleanup material employed in emissions unit P031 indicating whether or not the liquid organic material is photochemically reactive as defined in OAC rule 3745-21-01(C)(5).
[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.
2. The permittee shall collect and record the following information for each month for emissions unit P031:
 - a. The total number of gallons of cleanup material employed each month.
 - b. The organic compound content of the cleanup material, in pounds per gallon.
 - c. The monthly Acetone (OC) emissions from cleanup materials (a x b).
3. In order to determine compliance with the group annual OC emission limit, the permittee shall maintain monthly records of the following information for emissions units: P002 through P005, P030, P031, P033 and P034.
 - a. The company identification for each coating or gel coat employed in each emissions unit.
 - b. The number of pounds of each coating or gel coat material employed in each emissions unit.
 - c. The percent styrene of each coating or gel coat employed in each emissions unit.
 - d. The total organic compound emission rate for all coatings and gel coats, in pounds per month.
 - e. The rolling, 12-month summation of the total coating and gel coat usage figures for all emissions units in the group.
 - f. The rolling, 12-month summation of the OC emissions for all emissions units in the group.

The permittee already has existing coating usage records, therefore cumulative coating usage records are not needed for the first year.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the daily and/or hourly emissions limitations in T&C A.I.1.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the usage limitations in T&C A.II.1.

3. The permittee shall submit deviation (excursion) reports which identify an exceedance of the OC content limitation in T&C A.II.3.
4. The permittee shall submit a deviation (excursion) report which identifies an exceedance of the annual Acetone (OC) emissions limit from cleanup materials.
5. The permittee shall submit quarterly reports which specify the total organic compound emissions from emissions units P002 through P005, P030, P031, P033 and P034, combined for each calendar month. These reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and cover the previous three calendar months.
6. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive cleanup material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
7. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the visible particulate emissions limitation shall be demonstrated by Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources,").
2. Compliance with the OC emission limitations for emissions unit P031 shall be demonstrated by multiplying the amount of gel coat used by the appropriate emission factor found in the Unified Emission Factor (UEF) Table from "The Technical Discussion of the Unified Emission Factors for Open Molding of Composites" (dated July 23, 2001 or the most recent update) as follows:
 - a. $\text{\#/hr OC emissions} = \text{\#/day OC emissions} \div \text{hours of operation}$
 - b. $\text{\#/day OC emissions} = \text{\# gel coat/day} \times \text{emission factor} \times \text{Ton/2000\#}$
 - c. $\text{Ton/yr OC emissions} = \text{Ton gel coat/yr} \times \text{emission factor} \times \text{Ton/2000\#}$

* Based on a rolling 12-month summation.
3. Compliance with the usage restrictions in T&C A.II.1 shall be demonstrated by the recordkeeping in T&C A.III.1 and A.III.2.
4. Compliance with the Acetone (OC) emissions limitations, from cleanup materials, for emissions unit P031 shall be demonstrated by the recordkeeping in T&C A.III. 1 and A.III.2.

5. Compliance with the OC emission limit in T&C A.I.2.b. shall be demonstrated by the recordkeeping in T&C A.III.3 and the equation in term A.V.2.c.
6. Compliance with the particulate emission rate shall be demonstrated by the following:
 - a. $\text{Lbs/hr.} = \# \text{ gel coat/hr} \times (1 - \text{volatile content, percent by weight}) \times (1 - .75 \text{ overspray control}) \times (1 - .985 \text{ Control efficiency})$.
 - b. $\text{Lbs/hr.} = \# \text{ gel coat/day} \times (1 - \text{volatile content, percent by weight}) \times (1 - .75 \text{ overspray control}) \times (1 - .985 \text{ Control efficiency})$.
 - b. $\text{TPY} = \# \text{ gel coat/year} \times (1 - \text{volatile content, percent by weight}) \times (1 - .75 \text{ overspray control}) \times (1 - .985 \text{ Control efficiency}) \times \text{ton}/2000 \text{ lbs.}$
7. Compliance with T&C A.II.2 and A.II.3 shall be demonstrated by the recordkeeping in T&C A.III.1.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P031 - Service Gel Coat 2 Bldg B		See Term B. III. 1.

2. **Additional Terms and Conditions**

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit P031 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 Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s) from emissions units: P002-P006, P013-P017, P021, P025-P041.

Pollutant: Styrene

TLV (ug/m3): 85,000

Total Maximum Hourly Emission Rate for all styrene emitting emissions units (lbs/hr): 125.5

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1857

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 2029

Physical changes to or 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 Toxics 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 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.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied with 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.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P032 - RTM Pump 4 Main Bldg	OAC rule 3745-31-05(A)(3)	3.0 lbs/hr OC from coatings 40.0 lbs/day OC from coatings 19.8 lbs/day Acetone (OC) from cleanup materials 2.97 TPY Acetone (OC) from cleanup materials The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-31-28.
	OAC rule 3745-31-05(D)	See term A.I.2.b.
	OAC rule 3745-21-07(G)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-28	The requirements of this rule are satisfied by the requirements established in accordance with OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the cleanup material usage limits, OC emission limitations and compliance with the Air Toxics Policy.

- 2.b** The annual OC emission limit, from coatings, employed in emissions units P006, P013 through P017, P021, P027, P028, P032 and P035, combined shall not exceed 20.0 TPY, based on a rolling, 12-month summation.

II. Operational Restrictions

1. The amount of cleanup material used in emissions unit P032 shall not exceed 3.0 gallons/day and 900 gallons/year.
2. The permittee shall employ nonphotochemically reactive cleanup materials in emissions unit P032.
3. The permittee shall employ cleanup materials in emissions unit P032 which have a maximum OC content of 6.6 pounds of OC per gallon.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for emissions unit P032:
 - a. The company identification for each coating (neat resin) and cleanup material employed.
 - b. The number of pounds of each coating material employed.
 - c. The percent styrene of each coating employed in each emissions unit.
 - d. The number of gallons of cleanup material employed.
 - e. The organic compound content of the cleanup material, in pounds per gallon.
 - f. The total organic compound emission rate for all coatings, in pounds per day.
 - g. The daily emissions from cleanup materials (d x e).
 - h. The total number of hours the emissions unit was in operation.
 - i. The average hourly organic compound emission rate for all coatings, in pounds per hour (f/h).
 - j. A record of each liquid organic cleanup material employed in emissions unit P032 indicating whether or not the liquid organic material is photochemically reactive as defined in OAC rule 3745-21-01(C)(5).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

2. The permittee shall collect and record the following information for each month for emissions unit P032:
 - a. The total number of gallons of cleanup material employed each month.
 - b. The organic compound content of the cleanup material, in pounds per gallon.
 - c. The monthly Acetone (OC) emissions from cleanup materials (a x b).
3. In order to determine compliance with the group annual OC emission limit, the permittee shall maintain monthly records of the following information for emissions units P006, P013 through P017, P021, P027, P028, P032 and P035:
 - a. The company identification for each coating (neat resin) employed in each emissions unit.
 - b. The number of pounds of each coating material employed in each emissions unit.
 - c. The percent styrene of each coating employed in each emissions unit.
 - e. The total organic compound emission rate for all coatings, in pounds per month.
 - f. The rolling, 12-month summation of the total coating usage figures for emissions units P006, P013 through P017, P021, P027, P028, P032 and P035
 - g. The rolling, 12-month summation of the OC emissions for emissions units P006, P013 through P017, P021, P027, P028, P032 and P035

The permittee already has existing coating usage records, therefore cumulative coating usage records are not needed for the first year.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the daily and/or hourly emissions limitations in T&C A.I.1.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the usage limitations in T&C A.II.1.
3. The permittee shall submit deviation (excursion) reports which identify an exceedance of the OC content limitation in T&C A.II.3.
4. The permittee shall submit a deviation (excursion) report which identifies an exceedance of the annual Acetone (OC) emissions limit from cleanup materials.
5. The permittee shall submit quarterly reports which specify the total organic compound emissions from emissions units P002 through P005, P030, P031, P033 and P035 combined for each calendar

month. These reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and cover the previous three calendar months.

6. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive cleanup material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
7. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the OC emission limitations, from coatings, for emissions unit P032 shall be demonstrated by the following:
 - a. Emission Factor: AP-42 Table 4.4-2
 - b. $\#/\text{hr OC emissions} = \# / \text{day OC emissions divided by the hours of operation}$
 - c. $\#/\text{day OC emissions} = \# \text{ resin/day} \times \% \text{ styrene} \times \text{emission factor}$
 - d. $\text{Ton/yr OC emissions} = \text{Ton resin/yr} \times \% \text{ styrene} \times \text{emission factor}$

* Based on a rolling, 12-month summation.

2. Compliance with the Acetone (OC) emissions limitations, from cleanup materials, for emissions unit P032 shall be demonstrated by the recordkeeping in T&C A.III. 1 and 2.
3. Compliance with the usage restrictions in T&C A.II.1 shall be demonstrated by the recordkeeping in T&C A.III.1 and 2.
4. Compliance with the annual group emissions limit in T&C A.I.2.b. shall be demonstrated by the recordkeeping in T&C A.III.3 and the equation in term A.V.1.d.

VI. Miscellaneous Requirements

1. Per an electronic mail from Keith Barnett of USEPA dated September 26, 2001, there are no control requirements for RTM units in the proposed MACT.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P032 - RTM Pump 4 Main Bldg		See Term B. III. 1.

2. **Additional Terms and Conditions**

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit P032 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 Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s) from emissions units: P002-P006, P013-P017, P021, P025-P041.

Pollutant: Styrene

TLV (ug/m3): 85,000

Total Maximum Hourly Emission Rate for all styrene emitting emissions units (lbs/hr): 125.5

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1857

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 2029

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics 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 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.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied with 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.
- The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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 it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P033 - RTM Pump 7 Bldg B	OAC rule 3745-31-05(A)(3)	3 lbs/hr OC from coatings 40 lbs/day OC from coatings 19.8 lbs/day Acetone (OC) from cleanup materials 2.97 TPY of Acetone (OC) from cleanup materials The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-31-28.
	OAC rule 3745-31-05(D)	See term A.I.2.b.
	OAC rule 3745-21-07(G)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-28	The requirements of this rule are satisfied by the requirements established in accordance with OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the cleanup material usage limits, OC emission limitations and compliance with the Air Toxics Policy.

- 2.b** The annual OC emission limit, from coatings, employed in emissions units P002 through P005, P030, P031, P033 and P034, combined shall not exceed 25.0 TPY., based on a rolling, 12-month summation.

II. Operational Restrictions

1. The amount of cleanup material employed in emissions unit P033 shall not exceed 3.0 gallons/day and 900 gallons/year.
2. The permittee shall employ nonphotochemically reactive cleanup materials in emissions unit P033.
3. The permittee shall employ cleanup materials in emissions unit P033 which have a maximum OC content of 6.6 pounds per gallon.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for emissions unit P033:
 - a. The company identification for each coating (neat resin) and cleanup material employed.
 - b. The number of pounds of each coating material employed.
 - c. The percent styrene of each coating employed in each emissions unit.
 - d. The number of gallons of cleanup material employed.
 - e. The organic compound content of the cleanup material, in pounds per gallon.
 - f. The total organic compound emission rate for all coatings, in pounds per day.
 - g. The daily emissions from cleanup materials (d x e).
 - h. The total number of hours the emissions unit was in operation.
 - i. The average hourly organic compound emission rate for all coatings, in pounds per hour (f/h).
 - j. A record of each liquid organic cleanup material employed in emissions unit P002 indicating whether or not the liquid organic material is photochemically reactive as defined in OAC rule 3745-21-01(C)(5).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

2. The permittee shall collect and record the following information for each month for emissions unit P033:
 - a. The total number of gallons of cleanup material employed each month.
 - b. The organic compound content of the cleanup material, in pounds per gallon.
 - c. The monthly Acetone (OC) emissions from cleanup materials (a x b).

3. In order to determine compliance with the group annual OC emission limit, the permittee shall maintain monthly records of the following information for emissions units: P002 through P005, P030, P031, P033 and P034.
 - a. The company identification for each coating (neat resin) employed in each emissions unit.
 - b. The number of pounds of each coating material employed in each emissions unit.
 - c. The percent styrene of each coating employed in each emissions unit.
 - d. The total organic compound emission rate for all coatings, in pounds per month.
 - e. The rolling 12-month summation of the total coating usage figures for emissions units P002 through P005, P030, P031, P033 and P034.
 - f. The rolling 12-month summation of the OC emissions for emissions units P002 through P005, P030, P031, P033 and P034.

The permittee already has existing coating usage records, therefore cumulative coating usage records are not needed for the first year.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the daily and/or hourly emissions limitations in T&C A.I.1.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the usage limitations in T&C A.II.1.
3. The permittee shall submit deviation (excursion) reports which identify an exceedance of the OC content limitation in T&C A.II.3.
4. The permittee shall submit a deviation (excursion) report which identifies an exceedance of the annual Acetone (OC) emissions limit for cleanup materials.

5. The permittee shall submit quarterly reports which specify the total organic compound emissions from emissions units P002 through P005, P030, P031, P033 and P034, combined for each calendar month. These reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and cover the previous three calendar months.
6. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive cleanup material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
7. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the OC emission limitations, from coatings, for emissions unit P033 shall be demonstrated by the following:
 - a. Emission Factor: AP-42 Table 4.4-2
 - b. $\text{\#/hr OC emissions} = \text{\#/day OC emissions} \div \text{hours of operation}$
 - c. $\text{\#/day OC emissions} = \text{\# resin/day} \times \% \text{ styrene} \times \text{emission factor}$
 - d. $\text{Ton/yr OC emissions} = \text{Ton resin/yr} \times \% \text{ styrene} \times \text{emission factor}$

* Based on a rolling 12-month summation.
2. Compliance with the Acetone (OC) emissions limitations, from cleanup materials, for emissions unit P033 shall be demonstrated by the recordkeeping in T&C A.III. 1 and 2.
3. Compliance with the usage restrictions in T&C A.II.1 shall be demonstrated by the recordkeeping in T&C A.III.1 and 2.
4. Compliance with the annual group emissions limit in A.I.2.b. shall be demonstrated by the recordkeeping in T&C A.III.3 and the equation in term A.V.1.d.

VI. Miscellaneous Requirements

1. Per an electronic mail from Keith Barnett of USEPA dated September 26, 2001, there are no control requirements for RTM units in the proposed MACT.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P033 - RTM Pump 7 Bldg B		See Term B. III. 1.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit P033 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 Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s) from emissions units: P002-P006, P013-P017, P021, P025-P041.

Pollutant: Styrene

TLV (ug/m3): 85,000

Total Maximum Hourly Emission Rate for all styrene emitting emissions units (lbs/hr): 125.5

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1857

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 2029

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics 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 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.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied with 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.
- The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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 it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P034 - RTM Pump 8 Bldg B	OAC rule 3745-31-05(A)(3)	3 lbs/hr OC from coatings 40 lbs/day OC from coatings 19.8 lbs/day Acetone (OC) from cleanup materials 2.97 TPY of Acetone (OC) from cleanup materials The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-31-28.
	OAC rule 3745-31-05(D)	See term A.I.2.b.
	OAC rule 3745-21-07(G)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-28	The requirements of this rule are satisfied by the requirements established in accordance with OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the cleanup material usage limits, OC emission limitations and compliance with the Air Toxics Policy.

- 2.b** The annual OC emission limit, from coatings, employed in emissions units P002 through P005, P030, P031, P033 and P034, combined shall not exceed 25.0 TPY, based on a rolling, 12-month summation.

II. Operational Restrictions

1. The amount of cleanup material employed in emissions unit P034 shall not exceed 3.0 gallons/day and 900 gallons/year.
2. The permittee shall employ nonphotochemically reactive cleanup materials in emissions unit P034.
3. The permittee shall employ cleanup materials in emissions unit P034 which have a maximum OC content of 6.6 pounds per gallon.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for emissions unit P034:
 - a. The company identification for each coating (neat resin) and cleanup material employed.
 - b. The number of pounds of each coating material employed.
 - c. The percent styrene of each coating employed in each emissions unit.
 - d. The number of gallons of cleanup material employed.
 - e. The organic compound content of the cleanup material, in pounds per gallon.
 - f. The total organic compound emission rate for all coatings, in pounds per day.
 - g. The daily emissions from cleanup materials (d x e).
 - h. The total number of hours the emissions unit was in operation.
 - i. The average hourly organic compound emission rate for all coatings, in pounds per hour (f/h).
 - j. A record of each liquid organic cleanup material employed in emissions unit P002 indicating whether or not the liquid organic material is photochemically reactive as defined in OAC rule 3745-21-01(C)(5).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

2. The permittee shall collect and record the following information for each month for emissions unit P034:
 - a. The total number of gallons of cleanup material employed each month.
 - b. The organic compound content of the cleanup material, in pounds per gallon.
 - c. The monthly Acetone (OC) emissions from cleanup materials (a x b).
3. In order to determine compliance with the group annual OC emission limit, the permittee shall maintain monthly records of the following information for emissions units: P002 through P005, P030, P031, P033 and P034.
 - a. The company identification for each coating (neat resin) employed in each emissions unit.
 - b. The number of pounds of each coating material employed in each emissions unit.
 - c. The percent styrene of each coating employed in each emissions unit.
 - d. The total organic compound emission rate for all coatings, in pounds per month.
 - e. The rolling, 12-month summation of the total coating usage figures for emissions units P002 through P005, P030, P031, P033 and P034.
 - f. The rolling, 12-month summation of the OC emissions for emissions units P002 through P005, P030, P031, P033 and P034.

The permittee already has existing coating usage records, therefore cumulative coating usage records are not needed for the first year.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the daily and/or hourly emissions limitations in T&C A.I.1.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the usage limitations in T&C A.II.1.
3. The permittee shall submit deviation (excursion) reports which identify an exceedance of the OC content limitation in T&C A.II.3.
4. The permittee shall submit a deviation (excursion) report which identifies an exceedance of the annual Acetone (OC) emissions limit for cleanup materials.
5. The permittee shall submit quarterly reports which specify the total organic compound emissions from emissions units P002 through P005, P030, P031, P033 and P034, combined for each calendar

month. These reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and cover the previous three calendar months.

6. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive cleanup material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
7. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the OC emission limitations, from coatings, for emissions unit P034 shall be demonstrated by the following:
 - a. Emission Factor: AP-42 Table 4.4-2
 - b. $\#/\text{hr OC emissions} = \#/\text{day OC emissions divided by the hours of operation}$
 - c. $\#/\text{day OC emissions} = \# \text{ resin/day} \times \% \text{ styrene} \times \text{emission factor}$
 - d. $\text{Ton/yr OC emissions} = \text{Ton resin/yr} \times \% \text{ styrene} \times \text{emission factor}$

* Based on a rolling 12-month summation.

2. Compliance with the Acetone (OC) emissions limitations, from cleanup materials, for emissions unit P034 shall be demonstrated by the recordkeeping in T&C A.III. 1 and 2.
3. Compliance with the usage restrictions in T&C A.II.1 shall be demonstrated by the recordkeeping in T&C A.III.1 and 2.
4. Compliance with the annual group emissions limit in A.I.2.b. shall be demonstrated by the recordkeeping in T&C A.III.3 and the equation in term A.V.1.d.

VI. Miscellaneous Requirements

1. Per an electronic mail from Keith Barnett of USEPA dated September 26, 2001, there are no control requirements for RTM units in the proposed MACT.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P034 - RTM Pump 8 Bldg B	Air Toxics Policy	See Term B. III. 1.

2. **Additional Terms and Conditions**

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit P034 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 Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s) from emissions units: P002-P006, P013-P017, P021, P025-P041.

Pollutant: Styrene

TLV (ug/m3): 85,000

Total Maximum Hourly Emission Rate for all styrene emitting emissions units (lbs/hr): 125.5

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1857

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 2029

Physical changes to or 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 Toxics 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 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.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied with 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.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P035 - RTM Pump 8 Main Bldg	OAC rule 3745-31-05(A)(3)	5.0 lbs/hr OC from coatings 40.0 lbs/day OC from coatings 19.8 lbs/day Acetone (OC) from cleanup materials 2.97 TPY Acetone (OC) from cleanup materials The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-31-28.
	OAC rule 3745-31-05(D)	See term A.I.2.b.
	OAC rule 3745-21-07(G)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-28	The requirements of this rule are satisfied by the requirements established in accordance with OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the cleanup material usage limits, OC emission limitations and compliance with the Air Toxics Policy.
- 2.b The annual OC emission limit, from coatings, employed in emissions units: P006, P013 through P017, P021, P027, P028, P032 and P035, combined shall not exceed 20.0 TPY based on a rolling, 12-month summation.

II. Operational Restrictions

1. The amount of cleanup material used in emissions unit P035 shall not exceed 3.0 gallons/day and 900 gallons/year.
2. The permittee shall employ nonphotochemically reactive cleanup materials in emissions unit P035.
3. The permittee shall employ cleanup materials in emissions unit P035 which have a maximum OC content of 6.6 pounds of OC per gallon, as applied.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for emissions unit P035:
 - a. The company identification for each coating (neat resin) and cleanup material employed.
 - b. The number of pounds of each coating material employed.
 - c. The percent styrene of each coating employed in each emissions unit.
 - d. The number of gallons of cleanup material employed.
 - e. The organic compound content of the cleanup material, in pounds per gallon.
 - f. The total organic compound emission rate for all coatings, in pounds per day.
 - g. The daily emissions from cleanup materials (d x e).
 - h. The total number of hours the emissions unit was in operation.
 - i. The average hourly organic compound emission rate for all coatings, in pounds per hour (f/h).
 - j. A record of each liquid organic cleanup material employed in emissions unit P035 indicating whether or not the liquid organic material is photochemically reactive as defined in OAC rule 3745-21-01(C)(5).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

2. The permittee shall collect and record the following information for each month for emissions unit P035:
 - a. The total number of gallons of cleanup material employed each month.
 - b. The organic compound content of the cleanup material, in pounds per gallon.
 - c. The monthly Acetone (OC) emissions from cleanup materials (a x b).
3. In order to determine compliance with the group annual OC emission limit, the permittee shall maintain monthly records of the following information for emissions units: P006, P013 through P017, P021, P027, P028, P032 and P035:
 - a. The company identification for each coating (neat resin) employed in each emissions unit.
 - b. The number of pounds of each coating material employed in each emissions unit.
 - c. The percent styrene of each coating employed in each emissions unit.
 - d. The total organic compound emission rate for all coatings, in pounds per month.
 - e. The rolling, 12-month summation of the total coating usage figures for emissions units P006, P013 through P017, P021, P027, P028, P032 and P035.
 - f. The rolling, 12-month summation of the OC emissions for emissions units P006, P013 through P017, P021, P027, P028, P032 and P035.

The permittee already has existing coating usage records, therefore cumulative coating usage records are not needed for the first year.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the daily and/or hourly emissions limitations in T&C A.I.1.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the usage limitations in T&C A.II.1 .
3. The permittee shall submit deviation (excursion) reports which identify an exceedance of the OC content limitation in T&C A.II.3.
4. The permittee shall submit a deviation (excursion) report which identifies an exceedance of the annual Acetone (OC) emissions limit from cleanup materials.
5. The permittee shall submit quarterly reports which specify the total organic compound emissions from emissions units P006, P013 through P017, P021, P027, P028, P032 and P035, combined for

each calendar month. These reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and cover the previous three calendar months.

6. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive cleanup material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
7. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the OC emission limitations, from coatings, for emissions unit P035 shall be demonstrated by the following:
 - a. Emission Factor: AP-42 Table 4.4-2
 - b. $\text{\#/hr OC emissions} = \text{\#/day OC emissions} \div \text{hours of operation}$
 - c. $\text{\#/day OC emissions} = \text{\# resin/day} \times \text{\% styrene} \times \text{emission factor}$
 - d. $\text{Ton/yr OC emissions} = \text{Ton resin/yr} \times \text{\% styrene} \times \text{emission factor}$

* Based on a rolling 12-month summation.

2. Compliance with the Acetone (OC) emissions limitations, from cleanup materials, for emissions unit P035 shall be demonstrated by the recordkeeping in T&C A.III. 1 and 2.
3. Compliance with the usage restrictions in T&C A.II.1 shall be demonstrated by the recordkeeping in T&C A.III.1 and 2.
4. Compliance with the annual group emissions limit in T&C A.I.2.b. shall be demonstrated by the recordkeeping in T&C A.III.3 and the equation in term A.V.1.d.

VI. Miscellaneous Requirements

1. Per an electronic mail from Keith Barnett of USEPA dated September 26, 2001, there are no control requirements for RTM units in the proposed MACT.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P035 - RTM Pump 8 Main Bldg		See Term B. III. 1.

2. **Additional Terms and Conditions**

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit P035 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 Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s) from emissions units: P002-P006, P013-P017, P021, P025-P041.

Pollutant: Styrene

TLV (ug/m3): 85,000

Total Maximum Hourly Emission Rate for all styrene emitting emissions units (lbs/hr): 125.5

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1857

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 2029

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics 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 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.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied with 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.
- The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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 it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P036 - Hand Lay up Area	OAC rule 3745-31-05(A)(3)	1.0 lbs/hr OC from coatings 40.0 lbs/day OC from coatings 19.8 lbs/day Acetone (OC) from cleanup materials 2.97 TPY Acetone (OC) from cleanup materials The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
	OAC rule 3745-31-05(D)	1.0 TPY OC from coatings*
	OAC rule 3745-21-07(G)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). * Based on a rolling, 12-month summation.

2. **Additional Terms and Conditions**

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the cleanup material usage limits, OC emission limitations and compliance with the Air Toxics Policy.

II. Operational Restrictions

1. The amount of cleanup material used in emissions unit P036 shall not exceed 3.0 gallons/day and 900 gallons/year.

2. The permittee shall employ nonphotochemically reactive cleanup materials in emissions unit P036.
3. The permittee shall employ cleanup materials in emissions unit P036 which have a maximum OC content of 6.6 pounds of OC per gallon.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for emissions unit P036:
 - a. The company identification for each coating (neat resin) and cleanup material employed.
 - b. The number of pounds of each coating material employed.
 - c. The percent styrene of each coating employed in each emissions unit.
 - d. The number of gallons of cleanup material employed.
 - e. The organic compound content of the cleanup material, in pounds per gallon.
 - f. The total organic compound emission rate for all coatings, in pounds per day.
 - g. The daily emissions from cleanup materials (d x e).
 - h. The total number of hours the emissions unit was in operation.
 - i. The average hourly organic compound emission rate for all coatings, in pounds per hour (f)/(h).
 - j. A record of each liquid organic cleanup material employed in emissions unit P036 indicating whether or not the liquid organic material is photochemically reactive as defined in OAC rule 3745-21-01(C)(5).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

2. The permittee shall maintain monthly records of the following information for emissions unit P036:
 - a. The total number of gallons of cleanup material employed each month.
 - b. The organic compound content of the cleanup material, in pounds per gallon.
 - c. The monthly Acetone (OC) emissions from cleanup materials (b x c).
 - d. The coating usage for each month.

- e. The rolling, 12-month summation of the coating usage figures.
- f. The rolling, 12-month summation of the OC emissions.

The permittee already has existing coating usage records, therefore cumulative coating usage records are not needed for the first year.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the daily and/or hourly emissions limitations in T&C A.I.1.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the usage limitations in T&C A.II.1.
3. The permittee shall submit deviation (excursion) reports which identify an exceedance of the OC content limitation in T&C A.II.3.
4. The permittee shall submit a deviation (excursion) report which identifies an exceedance of the annual Acetone (OC) emissions limit from cleanup materials.
5. The permittee shall submit quarterly reports which specify the total organic compound emissions from this emissions unit for each calendar month. These reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and cover the previous three calendar months.
6. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive cleanup material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
7. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the OC emission limitations for emissions unit P036 shall be demonstrated by multiplying the amount of resin used by the appropriate emission factor found in the Unified Emission Factor (UEF) Table from "The Technical Discussion of the Unified Emission Factors for Open Molding of Composites" (dated July 23, 2001 or the most recent update) as follows:
 - a. $\#/\text{hr OC emissions} = \#/\text{day OC emissions divided by the hours of operation}$
 - b. $\#/\text{day OC emissions} = \# \text{ resin/day} \times \text{emission factor} \times \text{Ton}/2000\#$

c. $\text{Ton/yr OC emissions} = \text{Ton resin/yr} * X \text{ emission factor} * X \text{ Ton/2000\#}$

* Based on a rolling 12-month summation.

2. Compliance with the cleanup material usage restrictions in T&C A.II.1 shall be demonstrated by the recordkeeping in T&C A.III.1 and 2.
3. Compliance with the OC emission limit in T&C A.I.1 shall be demonstrated by the recordkeeping in T&C A.III.2 and the equation in term A.V.1.c.
4. Compliance with the OC emission limit in T&C A.II.3 shall be demonstrated by the recordkeeping in T&C A.III.2.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P036 - Hand Lay up Area		See Term B. III. 1.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit P036 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 Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s) from emissions units: P002-P006, P013-P017, P021, P025-P041.

Pollutant: Styrene

TLV (ug/m3): 85,000

Total Maximum Hourly Emission Rate for all styrene emitting emissions units (lbs/hr): 125.5

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1857

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 2029

Physical changes to or 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 Toxics 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 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.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied with 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.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P037 - Tooling Gel Coat Pump	OAC rule 3745-31-05(A)(3)	2.0 lbs/hr OC from coatings 40 lbs/day OC from coatings 3.3 lbs/day Acetone (OC) from cleanup materials 0.495 TPY Acetone (OC) from cleanup materials 0.27 lb/hr PM/PM10 1.38 lbs/day PM/PM10
	OAC rule 3745-31-05(D)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and OAC rule 3745-31-05(D). 0.3 TPY OC from coatings* 0.01 TPY PM/PM10*
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six minute average, except as specified by rule.
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

* Based on a rolling, 12-month summation.

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the cleanup material usage limits, OC emission limitations and compliance with the Air Toxics Policy.

II. Operational Restrictions

1. The amount of cleanup material used in emissions unit P037 shall not exceed 0.5 gallons/day and 150 gallons/year.
2. The permittee shall employ nonphotochemically reactive cleanup materials in emissions unit P037.
3. The permittee shall employ cleanup materials in emissions unit P037 which have a maximum OC content of 6.6 pounds of OC per gallon.
4. The permittee shall operate and maintain a filtering system to control particulate emissions from emissions unit P037.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for emissions unit P037:
 - a. The company identification for each gel coat (neat resin) and cleanup material employed.
 - b. The number of pounds of each gel coat material employed.
 - c. The percent styrene of each gel coat employed in each emissions unit.
 - d. The number of gallons of cleanup material employed.
 - e. The organic compound content of the cleanup material, in pounds per gallon.
 - f. The total organic compound emission rate for all gel coat, in pounds per day.
 - g. The daily emissions from cleanup materials (d x e).
 - h. The total number of hours the emissions unit was in operation.
 - i. The average hourly organic compound emission rate for all gel coat, in pounds per hour (f)/(h).
 - j. A record of each liquid organic cleanup material employed in emissions unit P037 indicating whether or not the liquid organic material is photochemically reactive as defined in OAC rule 3745-21-01(C)(5).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

2. The permittee shall maintain monthly records of the following information for emissions unit P037:
 - a. The total number of gallons of cleanup material employed each month.
 - b. The organic compound content of the cleanup material, in pounds per gallon.
 - c. The monthly Acetone (OC) emissions from cleanup materials (a x b).
 - d. The gel coat usage for each month.
 - e. The rolling, 12-month summation of the gel coat usage figures.
 - f. The rolling, 12-month summation of the OC emissions.

The permittee already has existing coating usage records, therefore cumulative coating usage records are not needed for the first year.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the daily and/or hourly emissions limitations in T&C A.I.1.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the usage limitations in T&C A.II.1.
3. The permittee shall submit deviation (excursion) reports which identify an exceedance of the OC content limitation in T&C A.II.3.
4. The permittee shall submit a deviation (excursion) report which identifies an exceedance of the annual Acetone (OC) emissions limit from cleanup materials.
5. The permittee shall submit quarterly reports which specify the total organic compound emissions from this emissions unit for each calendar month. These reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and cover the previous three calendar months.
6. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive cleanup material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
7. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the visible particulate emissions limitation shall be demonstrated by Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources,").
2. Compliance with the OC emission limitations for emissions unit P037 shall be demonstrated by multiplying the amount of gel coat used by the appropriate emission factor found in the Unified Emission Factor (UEF) Table from "The Technical Discussion of the Unified Emission Factors for Open Molding of Composites" (dated July 23, 2001 or the most recent update) as follows:
 - a. #/hr OC emissions = #/day OC emissions divided by the hours of operation
 - b. #/day OC emissions = # gel coat/day X emission factor X Ton/2000#
 - c. Ton/yr OC emissions = Ton gel coat/yr* X emission factor X Ton/2000#

* Based on a rolling, 12-month summation.
3. Compliance with the cleanup material usage restrictions in T&C A.II.1 shall be demonstrated by the recordkeeping in T&C A.III.1. and 2.
4. Compliance with the particulate emission rate shall be demonstrated by the following:
 - a. $\text{Lbs/hr.} = \# \text{ gel coat/hr} \times (1 - \text{volatile content, percent by weight}) \times (1 - .75 \text{ overspray control}) \times (1 - .985 \text{ Control efficiency}).$
 - b. $\text{Lbs/hr.} = \# \text{ gel coat/day} \times (1 - \text{volatile content, percent by weight}) \times (1 - .75 \text{ overspray control}) \times (1 - .985 \text{ Control efficiency}).$
 - b. $\text{TPY} = \# \text{ gel coat/year} \times (1 - \text{volatile content, percent by weight}) \times (1 - .75 \text{ overspray control}) \times (1 - .985 \text{ Control efficiency}) \times \text{ton}/2000 \text{ lbs.}$
5. Compliance with T&C A.II.2 and A.II.3 shall be demonstrated by the recordkeeping in T&C A.III.1.
6. Compliance with the OC emission limit in T&C A.I.1 shall be demonstrated by the recordkeeping in T&C A.III.2 and the equation in term A.V.2.c.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P037 - Tooling Gel Coat Pump		See Term B. III. 1.

2. **Additional Terms and Conditions**

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit P037 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 Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the “worst case” pollutant(s) from emissions units: P002-P006, P013-P017, P021, P025-P041.

Pollutant: Styrene

TLV (ug/m3): 85,000

Total Maximum Hourly Emission Rate for all styrene emitting emissions units (lbs/hr): 125.5

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1857

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 2029

Physical changes to or 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 Toxics 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 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.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied with 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.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P038 - Tooling Spray Chop	OAC rule 3745-31-05(A)(3)	2.0 lbs/hr OC from coatings 40 lbs/day OC from coatings 3.3 lbs/day Acetone (OC) from cleanup materials 0.495 TPY Acetone (OC) from cleanup materials 0.814 lb/hr PM/PM10 4.07 lbs/day PM/PM10
	OAC rule 3745-31-05(D)	0.5 TPY OC from coatings* 0.05 TPY PM/PM10*
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six minute average, except as specified by rule.
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

* Based on a rolling, 12-month summation.

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the cleanup material usage limits, OC emission limitations and compliance with the Air Toxics Policy.

II. Operational Restrictions

1. The amount of cleanup material used in emissions unit P038 shall not exceed 0.5 gallons/day and 150 gallons/year.
2. The permittee shall employ nonphotochemically reactive cleanup materials in emissions unit P038.
3. The permittee shall employ cleanup materials in emissions unit P038 which have a maximum OC content of 6.6 pounds of OC per gallon, as applied.
4. The permittee shall operate and maintain a filtering system to control particulate emissions from emissions unit P038.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for emissions unit P038:
 - a. The company identification for each coating (neat resin) and cleanup material employed.
 - b. The number of pounds of each coating material employed.
 - c. The percent styrene of each coating employed in each emissions unit.
 - d. The number of gallons of cleanup material employed.
 - e. The organic compound content of the cleanup material, in pounds per gallon.
 - f. The total organic compound emission rate for all coatings, in pounds per day.
 - g. The daily emissions from cleanup materials (d x e).
 - h. The total number of hours the emissions unit was in operation.
 - i. The average hourly organic compound emission rate for all coatings, in pounds per hour.
 - j. A record of each liquid organic cleanup material employed in emissions unit P038 indicating whether or not the liquid organic material is photochemically reactive as defined in OAC rule 3745-21-01(C)(5).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

2. The permittee shall maintain monthly records of the following information for emissions unit P038:
 - a. The total number of gallons of cleanup material employed each month.
 - b. The organic compound content of the cleanup material, in pounds per gallon.
 - c. The monthly Acetone (OC) emissions from cleanup materials (a x b).
 - d. The coating usage for each month.
 - e. The rolling, 12-month summation of the coating usage figures.
 - f. The rolling, 12-month summation of the OC emissions.

The permittee already has existing coating usage records, therefore cumulative coating usage records are not needed for the first year.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the daily and/or hourly emissions limitations in T&C A.I.1.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the usage limitations in T&C A.II.1.
3. The permittee shall submit deviation (excursion) reports which identify an exceedance of the OC content limitation in T&C A.II.3.
4. The permittee shall submit a deviation (excursion) report which identifies an exceedance of the annual Acetone (OC) emissions limit from cleanup materials.
5. The permittee shall submit quarterly reports which specify the total organic compound emissions from this emissions unit for each calendar month. These reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and cover the previous three calendar months.
6. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive cleanup material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
7. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the visible particulate emissions limitation shall be demonstrated by Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources,").
2. Compliance with the OC emission limitations for emissions unit P038 shall be demonstrated by multiplying the amount of gel coat used by the appropriate emission factor found in the Unified Emission Factor (UEF) Table from "The Technical Discussion of the Unified Emission Factors for Open Molding of Composites" (dated July 23, 2001 or the most recent update) as follows:
 - a. $\text{\#/hr OC emissions} = \text{\#/day OC emissions} \div \text{hours of operation}$
 - b. $\text{\#/day OC emissions} = \text{\# gel coat/day} \times \text{emission factor} \times \text{Ton/2000\#}$
 - c. $\text{Ton/yr OC emissions} = \text{Ton gel coat/yr} \times \text{emission factor} \times \text{Ton/2000\#}$

* Based on a rolling, 12-month summation.
3. Compliance with the cleanup material usage restrictions in T&C A.II.1 shall be demonstrated by the recordkeeping in T&C A.III.1. and 2.
4. Compliance with the particulate emission rate shall be demonstrated by the following:
 - a. $\text{Lbs/hr.} = \text{\# gel coat/hr} \times (1 - \text{volatile content, percent by weight}) \times (1 - .75 \text{ overspray control}) \times (1 - .985 \text{ Control efficiency})$
 - b. $\text{Lbs/hr.} = \text{\# gel coat/day} \times (1 - \text{volatile content, percent by weight}) \times (1 - .75 \text{ overspray control}) \times (1 - .985 \text{ Control efficiency})$
 - b. $\text{TPY} = \text{\# gel coat/year} \times (1 - \text{volatile content, percent by weight}) \times (1 - .75 \text{ overspray control}) \times (1 - .985 \text{ Control efficiency}) \times \text{ton/2000 lbs.}$
5. Compliance with T&C A.II.2 and A.II.3 shall be demonstrated by the recordkeeping in T&C A.III.1.
6. Compliance with the OC emission limit in T&C A.I.1 shall be demonstrated by the recordkeeping in T&C A.III.2 and the equation in term A.V.2.c.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P038 - Tooling Spray Chop		See Term B. III. 1.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit P038 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 Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s) from emissions units: P002-P006, P013-P017, P021, P025-P041.

Pollutant: Styrene

TLV (ug/m3): 85,000

Total Maximum Hourly Emission Rate for all styrene emitting emissions units (lbs/hr): 125.5

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1857

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 2029

Physical changes to or 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 Toxics 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 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.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied with 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.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P039 - Tooling Lay up	OAC rule 3745-31-05(A)(3)	2.0 lbs/hr OC from coatings 40.0 lbs/day OC from coatings 3.3 lbs/day Acetone (OC) from cleanup materials 0.495 TPY Acetone (OC) from cleanup materials The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
	OAC rule 3745-31-05(D)	0.2 TPY OC from coatings*
	OAC rule 3745-21-07(G)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). * Based on a rolling, 12-month summation.

2. **Additional Terms and Conditions**

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the cleanup material usage limits, OC emission limitations and compliance with the Air Toxics Policy.

II. Operational Restrictions

1. The amount of cleanup material used in emissions unit P039 shall not exceed 0.5 gallons/day and 150 gallons/year.
2. The permittee shall employ nonphotochemically reactive cleanup materials in emissions unit P039.

3. The permittee shall employ cleanup materials in emissions unit P039 which have a maximum OC content of 6.6 pounds of OC per gallon, as applied.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for emissions unit P039:
 - a. The company identification for each coating (neat resin) and cleanup material employed.
 - b. The number of pounds of each coating material employed.
 - c. The percent styrene of each coating employed in each emissions unit.
 - d. The number of gallons of cleanup material employed.
 - e. The organic compound content of the cleanup material, in pounds per gallon.
 - f. The total organic compound emission rate for all coatings, in pounds per day.
 - g. The daily emissions from cleanup materials (d x e).
 - h. The total number of hours the emissions unit was in operation.
 - i. The average hourly organic compound emission rate for all coatings, in pounds per hour.
 - j. A record of each liquid organic cleanup material employed in emissions unit P039 indicating whether or not the liquid organic material is photochemically reactive as defined in OAC rule 3745-21-01(C)(5).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

2. The permittee shall maintain monthly records of the following information for emissions unit P039:
 - a. The total number of gallons of cleanup material employed each month.
 - b. The organic compound content of the cleanup material, in pounds per gallon.
 - c. The monthly Acetone (OC) emissions from cleanup materials (a x b).
 - d. The coating usage for each month.
 - e. The rolling, 12-month summation of the coating usage figures.
 - f. The rolling 12-month summation of the OC emissions.

The permittee already has existing coating usage records, therefore cumulative coating usage records are not needed for the first year.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the daily and/or hourly emissions limitations in T&C A.I.1.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the usage limitations in T&C A.II.1.
3. The permittee shall submit deviation (excursion) reports which identify an exceedance of the OC content limitation in T&C A.II.3.
4. The permittee shall submit a deviation (excursion) report which identifies an exceedance of the annual Acetone (OC) emissions limit from cleanup materials.
5. The permittee shall submit quarterly reports which specify the total organic compound emissions from this emissions unit for each calendar month. These reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and cover the previous three calendar months.
6. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive cleanup material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
7. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the OC emission limitations for emissions unit P039 shall be demonstrated by multiplying the amount of resin used by the appropriate emission factor found in the Unified Emission Factor (UEF) Table from "The Technical Discussion of the Unified Emission Factors for Open Molding of Composites" (dated July 23, 2001 or the most recent update) as follows:
 - a. $\text{\#/hr OC emissions} = \text{\#/day OC emissions} \div \text{the hours of operation}$
 - b. $\text{\#/day OC emissions} = \text{\# resin/day} \times \text{emission factor} \times \text{Ton/2000\#}$
 - c. $\text{Ton/yr OC emissions} = \text{Ton resin/yr} \times \text{emission factor} \times \text{Ton/2000\#}$

* Based on a rolling 12-month summation.

2. Compliance with the cleanup material usage restrictions in T&C A.II.1 shall be demonstrated by the recordkeeping in T&C A.III.1 and 2.
3. Compliance with the OC emission limit in T&C A.I.1 shall be demonstrated by the recordkeeping in T&C A.III.2 and the equation in term A.V.1.c.
4. Compliance with the OC emission limit in T&C A.II.3 shall be demonstrated by the recordkeeping in T&C A.III.2.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P039 - Tooling Lay up		See Term B. III. 1.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit P039 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 Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s) from emissions units: P002-P006, P013-P017, P021, P025-P041.

Pollutant: Styrene

TLV (ug/m3): 85,000

Total Maximum Hourly Emission Rate for all styrene emitting emissions units (lbs/hr): 125.5

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1857

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 2029

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics 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 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.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied with 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.
- The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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 it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P018 - Manual Spray Chop Booth # 1 Modification	OAC rule 3745-31-05(A)(3)	8.0 lbs/hr OC from coatings 40 lbs/day OC from coatings 9.9 lbs/day Acetone (OC) from cleanup materials 1.8 TPY Acetone (OC) from cleanup materials 0.81 lb/hr PM/PM10 4.1 lbs/day PM/PM10
	OAC rule 3745-31-05(D)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-05(D) . See term A.I.2.b 0.51 TPY PM/PM10*
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six minute average, except as specified by rule.
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

| * Based on a rolling, 12-month summation.

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the cleanup material usage limits, OC emission limitations and compliance with the Air Toxics Policy.
- 2.b The annual OC emission limit, from coatings (resins), employed in emissions units P018, P019 and P020, combined shall not exceed 15.0 TPY based on a rolling, 12-month summation.

II. Operational Restrictions

- 1. The amount of cleanup material used in emissions unit P018 shall not exceed 1.5 gallons/day and 550 gallons/year.
- 2. The permittee shall employ nonphotochemically reactive cleanup materials in emissions unit P018.
- 3. The permittee shall employ cleanup materials in emissions unit P018 which have a maximum OC content of 6.6 pounds of OC per gallon, as applied.
- 4. The permittee shall operate and maintain a filtering system to control particulate emissions from emissions unit P018.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall collect and record the following information for each day for emissions unit P018:
 - a. The company identification for each coating (neat resin) and cleanup material employed.
 - b. The number of pounds of each coating material employed.
 - c. The percent styrene of each coating employed in each emissions unit.
 - d. The number of gallons of cleanup material employed.
 - e. The organic compound content of the cleanup material, in pounds per gallon.
 - f. The total organic compound emission rate for all coatings, in pounds per day.
 - g. The daily emissions from cleanup materials (d x e).
 - h. The total number of hours the emissions unit was in operation.
 - i. The average hourly organic compound emission rate for all coatings, in pounds per hour (f/h).

- j. A record of each liquid organic cleanup material employed in emissions unit P018 indicating whether or not the liquid organic material is photochemically reactive as defined in OAC rule 3745-21-01(C)(5).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

2. The permittee shall collect and record the following information for each month for emissions unit P018:
 - a. The total number of gallons of cleanup material employed each month.
 - b. The organic compound content of the cleanup material, in pounds per gallon.
 - c. The monthly Acetone (OC) emissions from cleanup materials (a x b).
3. In order to determine compliance with the group annual OC emission limit, the permittee shall maintain monthly records of the following information for emissions units: P018, P019 and P020.
 - a. The company identification for each coating (neat resin) employed in each emissions unit.
 - b. The number of pounds of each coating material employed in each emissions unit.
 - c. The percent styrene of each coating employed in each emissions unit.
 - d. The total organic compound emission rate for all coatings, in pounds per month.
 - e. The rolling, 12-month summation of the total coating usage figures for all emissions units in the group.
 - f. The rolling, 12-month summation of the OC emissions for all emissions units in the group.

The permittee already has existing coating usage records, therefore cumulative coating usage records are not needed for the first year.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the daily and/or hourly emissions limitations in T&C A.I.1.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the usage limitations in T&C A.II.1.
3. The permittee shall submit deviation (excursion) reports which identify an exceedance of the OC content limitation in T&C A.II.3.

4. The permittee shall submit a deviation (excursion) report which identifies an exceedance of the annual Acetone (OC) emissions limit from cleanup materials.
5. The permittee shall submit quarterly reports which specify the total organic compound emissions from emissions units P018, P019 and P020 for each calendar month. These reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and cover the previous three calendar months.
6. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive cleanup material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
7. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the visible particulate emissions limitation shall be demonstrated by Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources,").
2. Compliance with the OC emission limitations for emissions unit P018 shall be demonstrated by multiplying the amount of gel coat used by the appropriate emission factor found in the Unified Emission Factor (UEF) Table from "The Technical Discussion of the Unified Emission Factors for Open Molding of Composites" (dated July 23, 2001 or the most recent update) as follows:
 - a. $\text{\#/hr OC emissions} = \text{\#/day OC emissions} \div \text{hours of operation}$
 - b. $\text{\#/day OC emissions} = \text{\# gel coat/day} \times \text{emission factor} \times \text{Ton/2000\#}$
 - c. $\text{Ton/yr OC emissions} = \text{Ton gel coat/yr} \times \text{emission factor} \times \text{Ton/2000\#}$

* Based on a rolling 12-month summation.
3. Compliance with the usage restrictions in T&C A.II.1 shall be demonstrated by the recordkeeping in T&C A.III.1 and A.III.2.
4. Compliance with the Acetone (OC) emissions limitations, from cleanup materials, for emissions unit P018 shall be demonstrated by the recordkeeping in T&C A.III. 1 and A.III.2.

5. Compliance with the OC emission limit in T&C A.I.2.b. shall be demonstrated by the recordkeeping in T&C A.III.3 and the equation in term A.V.2.c.
6. Compliance with the particulate emission rate shall be demonstrated by the following:
 - a. $\text{Lbs/hr.} = \# \text{ gel coat/hr} \times (1 - \text{volatile content, percent by weight}) \times (1 - .75 \text{ overspray control}) \times (1 - .985 \text{ Control efficiency}).$
 - b. $\text{Lbs/hr.} = \# \text{ gel coat/day} \times (1 - \text{volatile content, percent by weight}) \times (1 - .75 \text{ overspray control}) \times (1 - .985 \text{ Control efficiency}).$
 - b. $\text{TPY} = \# \text{ gel coat/year} \times (1 - \text{volatile content, percent by weight}) \times (1 - .75 \text{ overspray control}) \times (1 - .985 \text{ Control efficiency}) \times \text{ton}/2000 \text{ lbs.}$
7. Compliance with T&C A.II.2 and A.II.3 shall be demonstrated by the recordkeeping in T&C A.III.1.

VI. Miscellaneous Requirements

1. The terms and conditions listed in this permit to install shall supercede all the air pollution control requirements for this emission unit contained in permit to install 14-02131, as issued on May 11, 1995.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P018 - Manual Spray Chop Booth # 1 Modification		See Term B. III. 1.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit P018 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 Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Styrene

TLV (ug/m3): 85,000

Total Maximum Hourly Emission Rate for emissions units P018 - P020 (lbs/hr): 21

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 349

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 2029

Physical changes to or 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 Toxics 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 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.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied with 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.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P019 - Manual Spray Chop Booth # 2 Modification	OAC rule 3745-31-05(A)(3)	8.0 lbs/hr OC from coatings 40 lbs/day OC from coatings 9.9 lbs/day Acetone (OC) from cleanup materials 1.8 TPY Acetone (OC) from cleanup materials 0.81 lb/hr PM/PM10 4.1 lbs/day PM/PM10
	OAC rule 3745-31-05(D)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-05(D) . See term A.I.2.b 0.51 TPY PM/PM10*
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six minute average, except as specified by rule.
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the cleanup material usage limits, OC emission limitations and compliance with the Air Toxics Policy.
- 2.b** The annual OC emission limit, from coatings (resins), employed in emissions units P018, P019 and P020, combined shall not exceed 15.0 TPY based on a rolling, 12-month summation.

II. Operational Restrictions

1. The amount of cleanup material used in emissions unit P018 shall not exceed 1.5 gallons/day and 550 gallons/year.
2. The permittee shall employ nonphotochemically reactive cleanup materials in emissions unit P019.
3. The permittee shall employ cleanup materials in emissions unit P019 which have a maximum OC content of 6.6 pounds of OC per gallon, as applied.
4. The permittee shall operate and maintain a filtering system to control particulate emissions from emissions unit P019.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for emissions unit P019:
 - a. The company identification for each coating (neat resin) and cleanup material employed.
 - b. The number of pounds of each coating material employed.
 - c. The percent styrene of each coating employed in each emissions unit.
 - d. The number of gallons of cleanup material employed.
 - e. The organic compound content of the cleanup material, in pounds per gallon.
 - f. The total organic compound emission rate for all coatings, in pounds per day.
 - g. The daily emissions from cleanup materials (d x e).
 - h. The total number of hours the emissions unit was in operation.
 - i. The average hourly organic compound emission rate for all coatings, in pounds per hour (f/h).

- j. A record of each liquid organic cleanup material employed in emissions unit P019 indicating whether or not the liquid organic material is photochemically reactive as defined in OAC rule 3745-21-01(C)(5).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

2. The permittee shall collect and record the following information for each month for emissions unit P019:
 - a. The total number of gallons of cleanup material employed each month.
 - b. The organic compound content of the cleanup material, in pounds per gallon.
 - c. The monthly Acetone (OC) emissions from cleanup materials (a x b).
3. In order to determine compliance with the group annual OC emission limit, the permittee shall maintain monthly records of the following information for emissions units: P018, P019 and P020.
 - a. The company identification for each coating (neat resin) employed in each emissions unit.
 - b. The number of pounds of each coating material employed in each emissions unit.
 - c. The percent styrene of each coating employed in each emissions unit.
 - d. The total organic compound emission rate for all coatings, in pounds per month.
 - e. The rolling, 12-month summation of the total coating usage figures for all emissions units in the group.
 - f. The rolling, 12-month summation of the OC emissions for all emissions units in the group.

The permittee already has existing coating usage records, therefore cumulative coating usage records are not needed for the first year.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the daily and/or hourly emissions limitations in T&C A.I.1.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the usage limitations in T&C A.II.1.
3. The permittee shall submit deviation (excursion) reports which identify an exceedance of the OC content limitation in T&C A.II.3.

4. The permittee shall submit a deviation (excursion) report which identifies an exceedance of the annual Acetone (OC) emissions limit from cleanup materials.
5. The permittee shall submit quarterly reports which specify the total organic compound emissions from emissions units P018, P019 and P020 for each calendar month. These reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and cover the previous three calendar months.
6. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive cleanup material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
7. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the visible particulate emissions limitation shall be demonstrated by Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources,").
2. Compliance with the OC emission limitations for emissions unit P019 shall be demonstrated by multiplying the amount of gel coat used by the appropriate emission factor found in the Unified Emission Factor (UEF) Table from "The Technical Discussion of the Unified Emission Factors for Open Molding of Composites" (dated July 23, 2001 or the most recent update) as follows:
 - a. $\text{\#/hr OC emissions} = \text{\#/day OC emissions} \text{ divided by the hours of operation}$
 - b. $\text{\#/day OC emissions} = \text{\# gel coat/day} \times \text{emission factor} \times \text{Ton/2000\#}$
 - c. $\text{Ton/yr OC emissions} = \text{Ton gel coat/yr} \times \text{emission factor} \times \text{Ton/2000\#}$

* Based on a rolling 12-month summation.
3. Compliance with the usage restrictions in T&C A.II.1 shall be demonstrated by the recordkeeping in T&C A.III.1 and A.III.2.
4. Compliance with the Acetone (OC) emissions limitations, from cleanup materials, for emissions unit P019 shall be demonstrated by the recordkeeping in T&C A.III. 1 and A.III.2.
5. Compliance with the OC emission limit in T&C A.I.2.b. shall be demonstrated by the recordkeeping in T&C A.III.3 and the equation in term A.V.2.c.

6. Compliance with the particulate emission rate shall be demonstrated by the following:
 - a. $\text{Lbs/hr.} = \# \text{ gel coat/hr} \times (1 - \text{volatile content, percent by weight}) \times (1 - .75 \text{ overspray control}) \times (1 - .985 \text{ Control efficiency})$.
 - b. $\text{Lbs/hr.} = \# \text{ gel coat/day} \times (1 - \text{volatile content, percent by weight}) \times (1 - .75 \text{ overspray control}) \times (1 - .985 \text{ Control efficiency})$.
 - b. $\text{TPY} = \# \text{ gel coat/year} \times (1 - \text{volatile content, percent by weight}) \times (1 - .75 \text{ overspray control}) \times (1 - .985 \text{ Control efficiency}) \times \text{ton}/2000 \text{ lbs.}$
7. Compliance with T&C A.II.2 and A.II.3 shall be demonstrated by the recordkeeping in T&C A.III.1.

VI. Miscellaneous Requirements

1. The terms and conditions listed in this permit to install shall supercede all the air pollution control requirements for this emission unit contained in permit to install 14-02131, as issued on May 11, 1995.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P019 - Manual Spray Chop Booth # 2 Modification		See Term B. III. 1.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit P019 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 Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: styrene

TLV (ug/m3): 85,000

Total Maximum Hourly Emission Rate for emissions units P018 - P020 (lbs/hr): 21

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 349

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 2029

Physical changes to or 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 Toxics 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 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.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied with 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.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P020 - Manual Gel Coat Booth # 1 Modification	OAC rule 3745-31-05(A)(3)	8.0 lbs/hr OC from coatings 40 lbs/day OC from coatings 9.9 lbs/day Acetone (OC) from cleanup materials 1.8 TPY Acetone (OC) from cleanup materials 0.81 lb/hr PM/PM10 4.1 lbs/day PM/PM10
	OAC rule 3745-31-05(D)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-05(D) . See term A.I.2.b 0.51 TPY PM/PM10*
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six minute average, except as specified by rule.
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

| * Based on a rolling, 12-month summation.

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the cleanup material usage limits, OC emission limitations and compliance with the Air Toxics Policy.
- 2.b The annual OC emission limit, from coatings (resins), employed in emissions units P018, P019 and P020, combined shall not exceed 15.0 TPY based on a rolling, 12-month summation.

II. Operational Restrictions

- 1. The amount of cleanup material used in emissions unit P020 shall not exceed 1.5 gallons/day and 550 gallons/year.
- 2. The permittee shall employ nonphotochemically reactive cleanup materials in emissions unit P020.
- 3. The permittee shall employ cleanup materials in emissions unit P020 which have a maximum OC content of 6.6 pounds of OC per gallon, as applied.
- 4. The permittee shall operate and maintain a filtering system to control particulate emissions from emissions unit P020.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall collect and record the following information for each day for emissions unit P020:
 - a. The company identification for each coating (neat resin) and cleanup material employed.
 - b. The number of pounds of each coating material employed.
 - c. The percent styrene of each coating employed in each emissions unit.
 - d. The number of gallons of cleanup material employed.
 - e. The organic compound content of the cleanup material, in pounds per gallon.
 - f. The total organic compound emission rate for all coatings, in pounds per day.
 - g. The daily emissions from cleanup materials (d x e).
 - h. The total number of hours the emissions unit was in operation.
 - i. The average hourly organic compound emission rate for all coatings, in pounds per hour (f/h).

- j. A record of each liquid organic cleanup material employed in emissions unit P020 indicating whether or not the liquid organic material is photochemically reactive as defined in OAC rule 3745-21-01(C)(5).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

2. The permittee shall collect and record the following information for each month for emissions unit P020:
 - a. The total number of gallons of cleanup material employed each month.
 - b. The organic compound content of the cleanup material, in pounds per gallon.
 - c. The monthly Acetone (OC) emissions from cleanup materials (a x b).
3. In order to determine compliance with the group annual OC emission limit, the permittee shall maintain monthly records of the following information for emissions units: P018, P019 and P020.
 - a. The company identification for each coating (neat resin) employed in each emissions unit.
 - b. The number of pounds of each coating material employed in each emissions unit.
 - c. The percent styrene of each coating employed in each emissions unit.
 - d. The total organic compound emission rate for all coatings, in pounds per month.
 - e. The rolling, 12-month summation of the total coating usage figures for all emissions units in the group.
 - f. The rolling, 12-month summation of the OC emissions for all emissions units in the group.

The permittee already has existing coating usage records, therefore cumulative coating usage records are not needed for the first year.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the daily and/or hourly emissions limitations in T&C A.I.1.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the usage limitations in T&C A.II.1.
3. The permittee shall submit deviation (excursion) reports which identify an exceedance of the OC content limitation in T&C A.II.3.

4. The permittee shall submit a deviation (excursion) report which identifies an exceedance of the annual Acetone (OC) emissions limit from cleanup materials.
5. The permittee shall submit quarterly reports which specify the total organic compound emissions from emissions units P018, P019 and P020 for each calendar month. These reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and cover the previous three calendar months.
6. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive cleanup material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
7. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the visible particulate emissions limitation shall be demonstrated by Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources,").
2. Compliance with the OC emission limitations for emissions unit P020 shall be demonstrated by multiplying the amount of gel coat used by the appropriate emission factor found in the Unified Emission Factor (UEF) Table from "The Technical Discussion of the Unified Emission Factors for Open Molding of Composites" (dated July 23, 2001 or the most recent update) as follows:
 - a. $\text{\#/hr OC emissions} = \text{\#/day OC emissions} \div \text{hours of operation}$
 - b. $\text{\#/day OC emissions} = \text{\# gel coat/day} \times \text{emission factor} \times \text{Ton/2000\#}$
 - c. $\text{Ton/yr OC emissions} = \text{Ton gel coat/yr} \times \text{emission factor} \times \text{Ton/2000\#}$

* Based on a rolling 12-month summation.
3. Compliance with the usage restrictions in T&C A.II.1 shall be demonstrated by the recordkeeping in T&C A.III.1 and A.III.2.
4. Compliance with the Acetone (OC) emissions limitations, from cleanup materials, for emissions unit P020 shall be demonstrated by the recordkeeping in T&C A.III. 1 and A.III.2.

5. Compliance with the OC emission limit in T&C A.I.2.b. shall be demonstrated by the recordkeeping in T&C A.III.3 and the equation in term A.V.2.c.
6. Compliance with the particulate emission rate shall be demonstrated by the following:
 - a. $\text{Lbs/hr.} = \# \text{ gel coat/hr} \times (1 - \text{volatile content, percent by weight}) \times (1 - .75 \text{ overspray control}) \times (1 - .985 \text{ Control efficiency}).$
 - b. $\text{Lbs/hr.} = \# \text{ gel coat/day} \times (1 - \text{volatile content, percent by weight}) \times (1 - .75 \text{ overspray control}) \times (1 - .985 \text{ Control efficiency}).$
 - b. $\text{TPY} = \# \text{ gel coat/year} \times (1 - \text{volatile content, percent by weight}) \times (1 - .75 \text{ overspray control}) \times (1 - .985 \text{ Control efficiency}) \times \text{ton}/2000 \text{ lbs.}$
7. Compliance with T&C A.II.2 and A.II.3 shall be demonstrated by the recordkeeping in T&C A.III.1.

VI. Miscellaneous Requirements

1. The terms and conditions listed in this permit to install shall supercede all the air pollution control requirements for this emission unit contained in permit to install 14-02131, as issued on May 11, 1995.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P020 - Manual Gel Coat Booth # 1 Modification		See Term B. III. 1.

2. **Additional Terms and Conditions**

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit P020 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 Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the “worst case” pollutant(s):

Pollutant: styrene

TLV (ug/m3): 85,000

Total Maximum Hourly Emission Rate for emissions units P018 - P020 (lbs/hr): 21

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 349

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 2029

Physical changes to or 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 Toxics 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 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.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied with 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.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None