



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.
Center

RE: PERMIT TO INSTALL MODIFICATION
FRANKLIN COUNTY
Application No: 01-07449

CERTIFIED MAIL

DATE: 8/3/2000

Capital Resin Corp
Todd Trowbridge
324 Dering Ave
Columbus, OH 432072956

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

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, Manager
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

CDO



Permit To Install
Terms and Conditions

Issue Date: 8/3/2000
Effective Date: 8/3/2000

ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 01-07449

Application Number: 01-07449
APS Premise Number: 0125040238
Permit Fee: \$0
Name of Facility: Capital Resin Corp
Person to Contact: Todd Trowbridge
Address: 324 Dering Ave
Columbus, OH 432072956

Location of proposed air contaminant source(s) [emissions unit(s)]:
324 Dering Ave
Columbus, OHIO

Description of modification:
Modification of PTI 01-7449 to resolve ERAC case number 254085 and administratively change emissions unit ID P026 to the new emissions unit ID P027 due to administrative error.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

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

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

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

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information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

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

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions 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 are inadequate or cannot meet applicable standards.

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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 prove to be inadequate or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

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

12. Best Available Technology

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

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the

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facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
Particulate Matter	0.26
Organic Compounds	14.06

PART II: SPECIAL TERMS AND CONDITIONS

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
750 gallon core coating mix tank a w/dust collector	OAC rule 3745-31-05	The organic compound emissions shall not exceed 3.2 lbs OC/batch and 7 tons OC per year; particulate emissions shall not exceed 0.06 lbs PM/hr and 0.13 ton PM per year and there shall be no visible fugitive particulate emissions during solids addition.
	OAC rule 3745-21-07(G)(2)	See A.2.a. below.
	OAC rule 3745-17-08	Less stringent than the OC limits established above.
	OAC rule 3745-17-07(A)	Less stringent than the PM limit above.
		Less stringent than the opacity limit above.

2. Additional Terms and Conditions

- 2.a The 3.2 lbs/batch OC emission limitation was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

1. The dust collector installed on this unit shall achieve 90% capture of dust and shall be operated within a pressure drop of between 2 and 10 inches water column during solids addition.
2. The solvent charge and mixing shall be done in a covered tank.
3. The permittee shall not produce more than 12 batches per day in this emissions unit.
4. The permittee shall apply for and obtain a permit to install prior to employing methanol in this emissions unit.

C. Monitoring and/or Recordkeeping Requirements

1. If the organic solvent formulation is the same as indicated in the application or organic solvents are not employed, the permittee shall record on a daily basis the following information:
 - a. the number of batches completed.
2. If the organic solvent formulation is not the same as indicated in the application and the organic solvents employed result in an increase in OC emissions, the permittee shall record on a per batch basis:
 - a. the date and number of the batch.
 - b. the organic solvent employed, the vapor pressure of each OC and the ambient temperature.
 - c. the amount of OC emissions for each component used (see table in E.1.) and for each step of the process (per the Batch Act equations and formulation data).
 - d. the total OC emissions for the batch i.e., the summation of all OC pollutants and all steps of the process (per Batch ACT equations and formulation data).
3. The permittee shall record the use any hazardous air pollutants (HAPs) employed in this emission unit and the resultant HAP emission rate in pounds per batch.
4. The permittee shall properly install, operate, and maintain equipment to monitor the

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pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual. The permittee shall record the pressure drop across the baghouse on a daily basis.

5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that a changed emissions unit will still satisfy the Air Toxic Policy:
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

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- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the Air Toxic Policy; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. all exceedances of the 12 batch per day limit specified in C.2.a. above.
 - b. all periods of time during which the pressure drop across the baghouse did not comply with allowable range specified in B.1. above.
 - c. all variations in the organic solvent formulations specified in C.2. that result in an exceedance of the batch organic compound limit.
 - d. each quarterly report shall include the date of each exceedance, the duration and amount of exceedance as well as corrective actions that were taken to achieve compliance.

E. Testing Requirements

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

Emission Limitation

Organic compound emissions shall not exceed 3.2 pounds per batch.

Applicable Compliance Method

CRC used USEPA-based batch act equations to calculate the maximum organic compound emissions during blending of 444 gallons isopropyl alcohol, 175 gallons of acetone (70% solvent by weight), and 131 gallons solids (30% by weight) followed by toting during a two hour batch cycle.

Process per tank	Isopropyl Alcohol: lbs	Acetone: lbs	Total Combined lbs
Charge	0.54	1.06	1.60
Mixing	0.04	0.08	0.12
Toting	0.48	0.99	1.46
Total	1.06	2.13	3.18

Emission Limitation

Organic compound emissions shall not exceed 7.0 tons per year.

Applicable Compliance Method

Compliance shall be based upon the record keeping specified in C(1) and shall be the sum of the 12 monthly batch production records for a calendar year times 3.2 lbs OC/batch and dividing by 2,000 lbs/ton.

F. Miscellaneous Requirements

The permit to install for this emissions unit P023 was evaluated based on the actual materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model (or other Ohio EPA approved model) and compared the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Acetone

TLV (ug/m3): 1,188,000

Maximum Hourly Emission Rate (lbs/hr): 2.1

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 592

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 28,286

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the Air Toxic Policy is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the Air Toxic Policy will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

If the permittee determines that the Air Toxic Policy will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(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.

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Emissions Unit ID: **P027**

MS AND CONDITIONS

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
750 gallon core coating mix tank b w/dust collector	OAC rule 3745-31-05	OAC rule 3745-21-07(G)(2)
		OAC rule 3745-17-08
		OAC rule 3745-17-07(A)

Applicable Emissions
Limitations/Control
Measures

The organic compound emissions shall not exceed 3.2 lbs OC/batch and 7 tons OC per year; particulate emissions shall not exceed 0.06 lb PM/hr and 0.13 ton PM per year and there shall be no visible fugitive particulate emissions during solids addition. See A.2.a. below.

Less stringent than the OC limits established above.

Less stringent than the PM limit above.

Less stringent than the opacity limit above.

2. Additional Terms and Conditions

- 2.a** The 3.2 lbs/batch OC emission limitation was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

1. The dust collector installed on this unit shall achieve 90% capture of dust and shall be operated within a pressure drop of between 2 and 10 inches water column during solids addition.
2. The solvent charge and mixing shall be done in a covered tank.
3. The permittee shall not produce more than 12 batches per day in this emissions unit.
4. The permittee shall apply for and obtain a permit to install prior to employing methanol in this emissions unit.
5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that a changed emissions unit will still satisfy the Air Toxic Policy:
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the Air Toxic Policy; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

C. Monitoring and/or Recordkeeping Requirements

1. If the organic solvent formulation is the same as indicated in the application or if organic solvents are not employed, the permittee shall record on a daily basis the following information:
 - a. the number of batches completed.
2. If the organic solvent formulation is not the same as indicated in the application and the organic solvents employed result in increased OC emissions, the permittee shall record on a per batch basis:
 - a. the date and number of the batch.

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Emissions Unit ID: **P027**

- b. the organic solvent employed, the vapor pressure of each OC and the ambient temperature.
- c. the amount of OC emissions for each component used (see table in E.1.) and for each step of the process (per the Batch Act equations and formulation data).

- d. the total OC emissions for the batch i.e., the summation of all OC pollutants and all steps of the process (per Batch ACT equations and formulation data).
3. The permittee shall record the use any hazardous air pollutants (HAPs) employed in this emission unit and the resultant HAP emission rate in pounds per batch
4. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual. The permittee shall record the pressure drop across the baghouse on a daily basis.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. all exceedances of the 12 batch per day limit specified in C.2.a. above.
 - b. all periods of time during which the pressure drop across the baghouse did not comply with allowable range specified in B.1. above.
 - c. all variations in the organic solvent formulations specified in C.2. that result in an exceedance of the batch organic compound limit.
 - d. each quarterly report shall include the date of each exceedance, the duration and amount of exceedance as well as corrective actions that were taken to achieve compliance.

E. Testing Requirements

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

Emission Limitation

Organic compound emissions shall not exceed 3.2 pounds per batch.

Applicable Compliance Method

CRC used USEPA-based batch act equations to calculate the maximum organic compound emissions during blending of 444 gallons isopropyl alcohol, 175 gallons of acetone (70% solvent by weight), and 131 gallons solids (30% by weight) followed by toting during a two hour batch cycle.

Process per tank	Isopropyl Alcohol: lbs	Acetone: lbs	Total Combined lbs
Charge	0.54	1.06	1.60
Mixing	0.04	0.08	0.12
Toting	0.48	0.99	1.46
Total	1.06	2.13	3.18

Emission Limitation

Organic compound emissions shall not exceed 7.0 tons per year.

Applicable Compliance Method

Compliance shall be based upon the record keeping specified in C(1) and shall be the sum of the 12 monthly batch production records for a calendar year times 3.2 lbs OC/batch and dividing by 2,000 lbs/ton.

F. Miscellaneous Requirements

The permit to install for this emissions unit P027 was evaluated based on the actual materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application. To fulfill the best available technology requirements of OAC rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model (or other Ohio EPA approved model) and compared the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Acetone

TLV (ug/m3): 1,188,000

Maximum Hourly Emission Rate (lbs/hr): 2.1

Predicted 1 Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 592

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 28,286

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the Air Toxic Policy is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the Air Toxic Policy will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

If the permittee determines that the Air Toxic Policy will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.