

AIR EMISSION SUMMARY

The air emissions units (EU) listed below comprise the Permit to Install for Marshall Industries located in Allen County. The emissions units listed below shall not exceed the emission limits / control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

Ohio EPA EU Number	Emissions Unit Identification / Description	BAT Determination	Applicable Federal and OAC Rules	Permit Allowable Mass Emissions and/or Control and Usage Requirements
P001	Polyester Resin 'Pulforming' Line	Compliance with the Terms and Conditions of this Permit, and compliance with the "Air Toxics Policy"	OAC 3745-31-05 OAC 3745-21-07 (G)(2)	1.95 lb/hr, 8.52 ton/yr OC from fabrication operations 364 lb/month, 2.2 ton/yr OC from clean-up operations, for P001 and P002 combined 40 lb/day OC *
P002	Polyester Resin 'Rollform Pultrusion' Line	Compliance with the Terms and Conditions of this Permit, and compliance with the "Air Toxics Policy"	OAC 3745-31-05 OAC 3745-21-07 (G)(2)	0.43 lb/hr, 1.88 ton/yr OC from fabrication operations 364 lb/month, 2.2 ton/yr OC from clean-up operations, for P001 and P002 combined *

* The emission limits of 8 lb/hr OC for P001, and 8 lb/hr OC and 40 lb/day OC for P002, based on this applicable rule, is less stringent than the limit established pursuant to OAC 3745-31-05.

**SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons / Year</u>
OC	12.6

ADDITIONAL SPECIAL TERMS AND CONDITIONS

Introduction

This Permit to Install (PTI) is for two specialty process polyester resin fabrication lines. They were relocated from another location in Allen County. PTIs at the previous location were 03-8502 for emissions unit P001 issued January 19, 1995, and 03-10726 for emissions unit P002 issued September 10, 1997.

A. Applicable Emission Limitations and/or Control Requirements

1. The organic compound (OC) limitations for fabrication line operation of 1.95 lb/hr for P001 and 0.43 lb/hr for P002, as specified in the "Air Emission Summary", reflect the potential to emit for these emissions units; therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limits.

B. Operational Restrictions

1. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI number 03-11322. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the volatile organic compound (OC) emission limitations specified in this permit were established in accordance with the Ohio EPA's "Air Toxics Policy" and are based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the 'Screen 3' model and a comparison of the predicted 1 hour maximum ground-level concentration to the MAGLC. The following summarizes the results of the modeling for each pollutant:

P001 and P002

Pollutant: styrene

TLV (ug/m3): 85,000

Maximum Hourly Emission Rate (lbs/hr): 0.52

Predicted 1 Hour Max. Ground-Level Concentration at the

Fenceline (ug/m3): 180

Maximum Acceptable Ground-Level Concentration (MAGLC)

(ug/m3): 2024

Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the Ohio EPA Northwest District Office are required, including the possible issuance of modifications to PTI number 03-11322 and the operating permit:

- a. any changes in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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 specified in the above table.

Marshall Industries
Application No. 03-11322
Page 2 of 3

- b. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table.
- c. any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01.

C. Monitoring and Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for each emissions unit separately (P001 and P002):
 - a. the type and weight, in pounds, of each polyester resin material employed (as applied);
 - b. the weight percentage of monomer (OC) for each polyester resin material (as applied);
 - c. the total OC emissions, in pounds, for each polyester resin material, calculated by the following: (a) above x (b) above x the emission factor of 0.052 ;
 - d. the total OC emissions, in pounds, for all polyester resin materials;
2. The permittee shall collect and record the following information each month for emissions units P001 and P002 combined:

- a. the name and identification number of each cleanup material employed;
 - b. the number of gallons of each cleanup material employed;
 - c. the OC content of each cleanup material, in pounds per gallon;
 - d. the OC emissions from each cleanup material, in pounds;
 - e. the total OC emissions for all cleanup materials, in tons;
3. 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, if a strip-chart recorder is employed, for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

D. Reporting Requirements

1. The permittee shall submit annual reports which specify the styrene, vinyl toluene, and total OC emissions for emissions units P001 and P002 for the previous calendar year. These reports shall be submitted by January 31 of each year.

Marshall Industries
Application No. 03-11322
Page 3 of 3

2. Quarterly written reports of 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, the probable cause of such deviations, and 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.)

E. Testing Requirements/ Compliance Method Determinations

1. Emission Limitations:

Emissions units P001: 40 lb/day, 8.52 ton/yr OC from
fabrication line operation
Emissions units P002: 1.88 ton/yr OC from fabrication
line operation

Emissions units P001
and P002 combined: 364 lb/mo, 2.2 ton/yr OC from clean-up

Applicable Compliance Method:

The record keeping requirements in Section C of this permit shall be used to determine compliance with the above limits.

Any determination of OC content, solids content, or density if a coating and/or cleanup material, or polyester resin material, shall be based on the coating/cleanup material as employed (as applied), including the addition of any thinner or viscosity reducer to the coating/cleanup material. The permittee shall determine the composition of the coatings/cleanup materials by formulation data supplied by the manufacturer of the coating/cleanup material or from data determined by an analysis of each coating/cleanup material, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the OC content of coatings/cleanup materials by Reference Method 24 or an equivalent or alternative method.

"OC content" means all organic compounds that are in a coating/cleanup material expressed as pounds of OC per gallon.

F. Miscellaneous Requirements

None

Prepared By: Paul Chad
Date: July 28, 1998