

Synthetic Minor Determination and/or **Netting Determination**

Permit To Install **08-04672**

A. Source Description

Green Tokai Co. LTD, an automobile parts manufacturing facility located in Brookville Ohio, is proposing a modification to 17 existing injection mold machines permitted under PTI 08-04434 and the installation of two new metal adhesive lines. The permittee would like to limit the VOC emissions from the entire project to less than 40 TPY VOC. Therefore, through the limitations on the coating and cleanup materials, this modification will be synthetic minor and avoid major non-attainment NSR provisions.

B. Facility Emissions and Attainment Status

Green Tokai Co. LTD is currently classified as a major stationary source pursuant to Title V operating permit requirements and major new source review (NSR) for VOC. Montgomery County is currently designated as non-attainment for ozone.

C. Source Emissions

The increase of emissions of VOC from this project, without any federally enforceable restrictions is 48.0 tons per year. Limiting the annual coating and cleanup material usages in all of the emission units (19) will limit the increase of VOC emissions to 36.57 tons per rolling, 12-month summation. Therefore the potential increase of emissions of VOC from this project is 36.57 tons per year.

D. Conclusion

Green Tokai Co. LTD will be issued a synthetic minor PTI for this project by means of limiting the annual usage and VOC content of the coating and cleanup materials. This will restrict the increase of VOC emissions from this project to below major modification threshold levels. Monthly monitoring, record keeping and calculations, along with quarterly deviation reports for all of the emissions units part of this project, will be required to monitor compliance. The increase of VOC emissions from this project will be limited to 36.57 tons per year. Therefore, through federally enforceable terms and conditions and record keeping requirements, Green Tokai Co. LTD will not trigger the major non-attainment requirements for ozone.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
MONTGOMERY COUNTY**

CERTIFIED MAIL

Street Address:

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

Mailing Address:

Lazarus Gov. Center

Application No: 08-04672

Fac ID: 0857011823

DATE: 5/5/2005

Green Tokai Co Ltd
Daniel Graham
55 Robert Wright Dr
Brookville, OH 45309-0000

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$3800** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern

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

CC: USEPA

RAPCA

Miami Valley Regional Planning Commission

KY

IN

MONTGOMERY COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 08-04672 FOR AN AIR CONTAMINANT SOURCE FOR
Green Tokai Co Ltd**

On 5/5/2005 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Green Tokai Co Ltd**, located at **55 Robert Wright Dr, Brookville, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 08-04672:

Chapter 31 modification replacing PTI 08-04434 issued 9/17/02 to identify 18 emission units separately and SMTV to get out of TV.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

John Paul, Regional Air Pollution Control Agency, 117 South Main Street, Dayton, OH 45422-1280
[(937)225-4435]



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 08-04672

Application Number: 08-04672
Facility ID: 0857011823
Permit Fee: **To be entered upon final issuance**
Name of Facility: Green Tokai Co Ltd
Person to Contact: Daniel Graham
Address: 55 Robert Wright Dr
Brookville, OH 453090000

Location of proposed air contaminant source(s) [emissions unit(s)]:
**55 Robert Wright Dr
Brookville, Ohio**

Description of proposed emissions unit(s):
Chapter 31 modification replacing PTI 08-04434 issued 9/17/02 to identify 18 emission units separately and SMTV to get out of TV.

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

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.9 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.

Green Tokai Co Ltd

Facility ID: 0857011823

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Issued: To be entered upon final issuance

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

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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

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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 ninety (90) 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.

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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

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

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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

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emissions unit(s).

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) 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>
VOC	42

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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>
P034 - Injection Mold 500G *modification	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
	OAC rule 3745-21-07(G)(2)	The organic compound (OC) emissions from this emissions unit shall not exceed 1.66 lbs/hr and 40 lbs/day including cleanup.
	OAC rule 3745-31-05(C) (Synthetic minor to avoid non-attainment provisions)	The VOC emission rate from this emissions unit shall not exceed 2.0 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions.

2. Additional Terms and Conditions

- 2.a The 1.66 lbs/hr OC emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.

Issued: To be entered upon final issuance**II. Operational Restrictions**

1. The maximum annual isopropyl alcohol usage rate shall not exceed 400 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of isopropyl alcohol, in the first twelve months does not need to be established.
2. The maximum annual mold cleaner usage rate shall not exceed 131 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of mold cleaner, in the first twelve months does not need to be established.
3. The maximum annual primer usage rate shall not exceed 96 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of primer, in the first twelve months does not need to be established.
4. The OC content of the isopropyl alcohol shall not exceed 6.59 pounds of OC per gallon.
5. The OC content of the mold cleaner shall not exceed 5.7 pounds of OC per gallon.
6. The OC content of the primer shall not exceed 6.42 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 the injection mold operation:
 - a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons for each coating and cleanup material employed.
 - c. The OC content for each coating and cleanup material employed, in pounds per gallon.
 - d. The total OC emission rate for all the coatings and cleanup materials employed, in pounds [summation of (b x c) for all coatings + summation of (b x c) for all cleanup materials].
2. The permittee shall collect and record the following information each month for the injection mold operation:
 - a. The rolling, 12-month summation of the monthly isopropyl alcohol usage, in gallons.

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- b. The rolling, 12-month summation of the monthly mold cleaner usage, in gallons.
- c. The rolling, 12-month summation of the monthly primer usage, in gallons.
- d. The rolling, 12-month summation of the monthly OC mass emissions rate. i.e., $(1.c \times 2.a) + (1.c \times 2.b) + (1.c \times 2.c)$ divided by 2000 lbs/ton.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the OC emission rate from the coatings and cleanup materials exceeded 40 pounds per day, and the actual daily OC emission rate for each such day.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12 month isopropyl alcohol, mold cleaner and primer usage limitations, in gallons and the actual rolling, 12-month usage summation, in gallons, for each such month.
3. The permittee shall notify the Director (RAPCA) in writing of any monthly record showing the use of noncomplying isopropyl, mold cleaner and primer, i.e., for VOC content. 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 30 days following the end of the calendar month.
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12 month OC emissions limitation, and the actual rolling, 12-month OC emissions for each such month.
5. The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.
6. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

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

Emissions Unit ID: P034

- a. Emission Limitation -
1.66 lbs OC/hr, including cleanup
- Applicable Compliance Method -
Compliance with the hourly allowable OC emission limitation may be determined as follows:
- i. multiply the maximum OC content of all the coatings (lbs/gallon) by the maximum coatings usage rate (gallons/hr);
 - ii. multiply the maximum OC content of all the cleanup materials (lbs/gallon) by the maximum cleanup materials usage rate (gallons/hr); and
 - iii. add i and ii.
- If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation based upon the results of emission tests conducted in accordance with Methods 1 - 4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.
- b. Emission Limitation-
40 lbs OC/day, including cleanup
- Applicable Compliance Method-
Compliance with the daily allowable OC emission limitation above shall be based upon the record keeping requirements contained in Section A.III.1.d of this permit.
- c. Emission Limitation-
2.0 tons OC/yr, including cleanup as a rolling 12-month summation
- Applicable Compliance Method-
Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements contained in Section A.III.2.d of this permit.
- d. Emission Limitation-
6.59 lbs OC/gallon of Isopropyl alcohol
- 5.7 lbs OC/gallon of Mold Cleaner
- 6.42 lbs OC/gallon of primer
- Applicable Compliance Method-
Compliance shall be based upon the record keeping requirements specified in Section III.1.c. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

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VI. Miscellaneous Requirements

1. Terms in this permit supercede those identified in PTI 08-04434 for emissions unit P034 issued 09/07/02 and represents a 5.3 tons OC/yr reduction in mass OC allowable emissions. P034 (4 injection mold machines) was previously permitted at 7.3 TPY, now 4 units will be permitted at 2 TPY x 4 = 8 TPY and the overall change is an increase of 0.7 TPY.

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 - Injection Mold 500G	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions units P034 thru P050 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene

TLV (mg/m3): 188.4 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 4.86 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,856 ug/m3

MAGLC (ug/m3): 4486 ug/m3

Issued: To be entered upon final issuance

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.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

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 - Injection Mold 500B	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
	OAC rule 3745-21-07(G)(2)	The organic compound (OC) emissions from this emissions unit shall not exceed 1.66 lbs/hr and 40 lbs/day including cleanup.
	OAC rule 3745-31-05(C) (Synthetic minor to avoid non-attainment provisions)	The emission limitations specified by this rule are less stringent than or as stringent as the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
		The VOC emission rate from this emissions unit shall not exceed 2.0 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions.

2. Additional Terms and Conditions

- 2.a The 1.66 lbs/hr OC emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.

Issued: To be entered upon final issuance

II. Operational Restrictions

1. The maximum annual isopropyl alcohol usage rate shall not exceed 400 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of isopropyl alcohol, in the first twelve months does not need to be established.
2. The maximum annual mold cleaner usage rate shall not exceed 131 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of mold cleaner, in the first twelve months does not need to be established.
3. The maximum annual primer usage rate shall not exceed 96 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of primer, in the first twelve months does not need to be established.
4. The OC content of the isopropyl alcohol shall not exceed 6.59 pounds of OC per gallon.
5. The OC content of the mold cleaner shall not exceed 5.7 pounds of OC per gallon.
6. The OC content of the primer shall not exceed 6.42 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 the injection mold operation:
 - c. The company identification for each coating and cleanup material employed.
 - d. The number of gallons for each coating and cleanup material employed.
 - e. The OC content for each coating and cleanup material employed, in pounds per gallon.
 - f. The total OC emission rate for all the coatings and cleanup materials employed, in pounds [summation of (b x c) for all coatings + summation of (b x c) for all cleanup materials].
2. The permittee shall collect and record the following information each month for the injection mold operation:
 - a. The rolling, 12-month summation of the monthly isopropyl alcohol usage, in gallons.

- b. The rolling, 12-month summation of the monthly mold cleaner usage, in gallons.
- c. The rolling, 12-month summation of the monthly primer usage, in gallons.
- d. The rolling, 12-month summation of the monthly OC mass emissions rate. i.e., $(1.c \times 2.a) + (1.c \times 2.b) + (1.c \times 2.c)$ divided by 2000 lbs/ton.

Issued: To be entered upon final issuance**IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the OC emission rate from the coatings and cleanup materials exceeded 40 pounds per day, and the actual daily OC emission rate for each such day.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12 month isopropyl alcohol, mold cleaner and primer usage limitations, in gallons and the actual rolling, 12-month usage summation, in gallons, for each such month.
3. The permittee shall notify the Director (RAPCA) in writing of any monthly record showing the use of noncomplying isopropyl, mold cleaner and primer, i.e., for VOC content. 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 30 days following the end of the calendar month.
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12 month OC emissions limitation, and the actual rolling, 12-month OC emissions for each such month.
5. The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.
6. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emissions limitations in section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation -
1.66 lbs OC/hr, including cleanup

Applicable Compliance Method -
Compliance with the hourly allowable OC emission limitation may be determined as follows:

Issued: To be entered upon final issuance

- i. multiply the maximum OC content of all the coatings (lbs/gallon) by the maximum coatings usage rate (gallons/hr);
- ii. multiply the maximum OC content of all the cleanup materials (lbs/gallon) by the maximum cleanup materials usage rate (gallons/hr); and
- iii. add i and ii.

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation based upon the results of emission tests conducted in accordance with Methods 1 - 4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- b. Emission Limitation-
40 lbs OC/day, including cleanup

Applicable Compliance Method-

Compliance with the daily allowable OC emission limitation above shall be based upon the record keeping requirements contained in Section A.III.1.d of this permit.

- c. Emission Limitation-
2.0 tons OC/yr, including cleanup as a rolling 12-month summation

Applicable Compliance Method-

Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements contained in Section A.III.2.d of this permit.

- d. Emission Limitation-
6.59 lbs OC/gallon of Isopropyl alcohol

5.7 lbs OC/gallon of Mold Cleaner

6.42 lbs OC/gallon of primer

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section III.1.c. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

VI. Miscellaneous Requirements

1. Terms in this permit supercede those identified in PTI 08-04434 for emissions unit P035 issued

Green Tokai Co Ltd

PTI Application: 08 04670

Issued

Facility ID: 0857011823

Emissions Unit ID: P035

09/07/02 and represents a 5.3 tons OC/yr reduction in mass OC allowable emissions. P035 (5 injection mold machines) was previously permitted at 7.3 TPY, now 5 units will be permitted at 2 TPY x 5 = 10 TPY and the overall change is an increase of 2.7 TPY.

Issued: To be entered upon final issuance

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 - Injection Mold 500B	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions units P034 thru P050 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene

TLV (mg/m3): 188.4 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 4.86 lbs/hr

Issued: To be entered upon final issuance

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,856 ug/m3

MAGLC (ug/m3): 4486 ug/m3

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.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
 3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

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

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

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 - Injection Mold 610D	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
	OAC rule 3745-21-07(G)(2)	The organic compound (OC) emissions from this emissions unit shall not exceed 1.66 lbs/hr and 40 lbs/day including cleanup.
	OAC rule 3745-31-05(C) (Synthetic minor to avoid non-attainment provisions)	The emission limitations specified by this rule are less stringent than or as stringent as the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
		The VOC emission rate from this emissions unit shall not exceed 2.0 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions.

2. Additional Terms and Conditions

- 2.a The 1.66 lbs/hr OC emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.

Issued: To be entered upon final issuance

II. Operational Restrictions

1. The maximum annual isopropyl alcohol usage rate shall not exceed 400 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of isopropyl alcohol, in the first twelve months does not need to be established.
2. The maximum annual mold cleaner usage rate shall not exceed 131 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of mold cleaner, in the first twelve months does not need to be established.
3. The maximum annual primer usage rate shall not exceed 96 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of primer, in the first twelve months does not need to be established.
4. The OC content of the isopropyl alcohol shall not exceed 6.59 pounds of OC per gallon.
5. The OC content of the mold cleaner shall not exceed 5.7 pounds of OC per gallon.
6. The OC content of the primer shall not exceed 6.42 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 the injection mold operation:
 - c. The company identification for each coating and cleanup material employed.
 - d. The number of gallons for each coating and cleanup material employed.
 - e. The OC content for each coating and cleanup material employed, in pounds per gallon.
 - f. The total OC emission rate for all the coatings and cleanup materials employed, in pounds [summation of (b x c) for all coatings + summation of (b x c) for all cleanup materials].
2. The permittee shall collect and record the following information each month for the injection mold operation:
 - a. The rolling, 12-month summation of the monthly isopropyl alcohol usage, in gallons.

- b. The rolling, 12-month summation of the monthly mold cleaner usage, in gallons.
- c. The rolling, 12-month summation of the monthly primer usage, in gallons.
- d. The rolling, 12-month summation of the monthly OC mass emissions rate. i.e., $(1.c \times 2.a) + (1.c \times 2.b) + (1.c \times 2.c)$ divided by 2000 lbs/ton.

Issued: To be entered upon final issuance**IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the OC emission rate from the coatings and cleanup materials exceeded 40 pounds per day, and the actual daily OC emission rate for each such day.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12 month isopropyl alcohol, mold cleaner and primer usage limitations, in gallons and the actual rolling, 12-month usage summation, in gallons, for each such month.
3. The permittee shall notify the Director (RAPCA) in writing of any monthly record showing the use of noncomplying isopropyl, mold cleaner and primer, i.e., for VOC content. 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 30 days following the end of the calendar month.
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12 month OC emissions limitation, and the actual rolling, 12-month OC emissions for each such month.
5. The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.
6. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emissions limitations in section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation -
1.66 lbs OC/hr, including cleanup

Applicable Compliance Method -
Compliance with the hourly allowable OC emission limitation may be determined as follows:

Issued: To be entered upon final issuance

- i. multiply the maximum OC content of all the coatings (lbs/gallon) by the maximum coatings usage rate (gallons/hr);
- ii. multiply the maximum OC content of all the cleanup materials (lbs/gallon) by the maximum cleanup materials usage rate (gallons/hr); and
- iii. add i and ii.

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation based upon the results of emission tests conducted in accordance with Methods 1 - 4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- b. Emission Limitation-
40 lbs OC/day, including cleanup

Applicable Compliance Method-

Compliance with the daily allowable OC emission limitation above shall be based upon the record keeping requirements contained in Section A.III.1.d of this permit.

- c. Emission Limitation-
2.0 tons OC/yr, including cleanup as a rolling 12-month summation

Applicable Compliance Method-

Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements contained in Section A.III.2.d of this permit.

- d. Emission Limitation-
6.59 lbs OC/gallon of Isopropyl alcohol

5.7 lbs OC/gallon of Mold Cleaner

6.42 lbs OC/gallon of primer

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section III.1.c. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

VI. Miscellaneous Requirements

1. Terms in this permit supercede those identified in PTI 08-04434 for emissions unit P036 issued

Green Tokai Co Ltd**PTI Application: 08 04670****Issued****Facility ID: 0857011823**

Emissions Unit ID: P036

09/07/02 and represents a 5.3 tons OC/yr reduction in mass OC allowable emissions. P036 (4 injection mold machines) was previously permitted at 7.3 TPY, now 4 units will be permitted at 2 TPY x 4 = 8 TPY and the overall change is an increase of 0.7 TPY.

Issued: To be entered upon final issuance

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 - Injection Mold 610D	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions units P034 thru P050 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene

TLV (mg/m3): 188.4 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 4.86 lbs/hr

Issued: To be entered upon final issuance

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,856 ug/m3

MAGLC (ug/m3): 4486 ug/m3

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.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
 3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

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

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

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 - Injection Mold 2450	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C). The organic compound (OC) emissions from this emissions unit shall not exceed 1.66 lbs/hr and 40 lbs/day including cleanup.
	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than or as stringent as the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C) (Synthetic minor to avoid non-attainment provisions)	The VOC emission rate from this emissions unit shall not exceed 2.0 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions.

2. Additional Terms and Conditions

- 2.a The 1.66 lbs/hr OC emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.

Issued: To be entered upon final issuance

II. Operational Restrictions

1. The maximum annual isopropyl alcohol usage rate shall not exceed 400 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of isopropyl alcohol, in the first twelve months does not need to be established.
2. The maximum annual mold cleaner usage rate shall not exceed 131 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of mold cleaner, in the first twelve months does not need to be established.
3. The maximum annual primer usage rate shall not exceed 96 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of primer, in the first twelve months does not need to be established.
4. The OC content of the isopropyl alcohol shall not exceed 6.59 pounds of OC per gallon.
5. The OC content of the mold cleaner shall not exceed 5.7 pounds of OC per gallon.
6. The OC content of the primer shall not exceed 6.42 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 the injection mold operation:
 - c. The company identification for each coating and cleanup material employed.
 - d. The number of gallons for each coating and cleanup material employed.
 - e. The OC content for each coating and cleanup material employed, in pounds per gallon.
 - f. The total OC emission rate for all the coatings and cleanup materials employed, in pounds [summation of (b x c) for all coatings + summation of (b x c) for all cleanup materials].
2. The permittee shall collect and record the following information each month for the injection mold operation:
 - a. The rolling, 12-month summation of the monthly isopropyl alcohol usage, in gallons.

- b. The rolling, 12-month summation of the monthly mold cleaner usage, in gallons.
- c. The rolling, 12-month summation of the monthly primer usage, in gallons.
- d. The rolling, 12-month summation of the monthly OC mass emissions rate. i.e., $(1.c \times 2.a) + (1.c \times 2.b) + (1.c \times 2.c)$ divided by 2000 lbs/ton.

Issued: To be entered upon final issuance**IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the OC emission rate from the coatings and cleanup materials exceeded 40 pounds per day, and the actual daily OC emission rate for each such day.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12 month isopropyl alcohol, mold cleaner and primer usage limitations, in gallons and the actual rolling, 12-month usage summation, in gallons, for each such month.
3. The permittee shall notify the Director (RAPCA) in writing of any monthly record showing the use of noncomplying isopropyl, mold cleaner and primer, i.e., for VOC content. 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 30 days following the end of the calendar month.
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12 month OC emissions limitation, and the actual rolling, 12-month OC emissions for each such month.
5. The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.
6. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emissions limitations in section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation -
1.66 lbs OC/hr, including cleanup

Applicable Compliance Method -
Compliance with the hourly allowable OC emission limitation may be determined as follows:

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- i. multiply the maximum OC content of all the coatings (lbs/gallon) by the maximum coatings usage rate (gallons/hr);
- ii. multiply the maximum OC content of all the cleanup materials (lbs/gallon) by the maximum cleanup materials usage rate (gallons/hr); and
- iii. add i and ii.

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation based upon the results of emission tests conducted in accordance with Methods 1 - 4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- b. Emission Limitation-
40 lbs OC/day, including cleanup

Applicable Compliance Method-

Compliance with the daily allowable OC emission limitation above shall be based upon the record keeping requirements contained in Section A.III.1.d of this permit.

- c. Emission Limitation-
2.0 tons OC/yr, including cleanup as a rolling 12-month summation

Applicable Compliance Method-

Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements contained in Section A.III.2.d of this permit.

- d. Emission Limitation-
6.59 lbs OC/gallon of Isopropyl alcohol

5.7 lbs OC/gallon of Mold Cleaner

6.42 lbs OC/gallon of primer

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section III.1.c. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

VI. Miscellaneous Requirements

1. Terms in this permit supercede those identified in PTI 08-04434 for emissions unit P037 issued

Green Tokai Co Ltd**PTI Application: 08 04672****Issued****Facility ID: 0857011823**

Emissions Unit ID: P037

09/07/02 and represents a 5.3 tons OC/yr reduction in mass OC allowable emissions. P037 (4 injection mold machines) was previously permitted at 7.3 TPY, now 4 units will be permitted at 2 TPY x 4 = 8 TPY and the overall change is an increase of 0.7 TPY.

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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 - Injection Mold 2450	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions units P034 thru P050 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene

TLV (mg/m3): 188.4 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 4.86 lbs/hr

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Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,856 ug/m3

MAGLC (ug/m3): 4486 ug/m3

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.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
 3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

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

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

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 - Injection Mold 550F	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C). The organic compound (OC) emissions from this emissions unit shall not exceed 1.66 lbs/hr and 40 lbs/day including cleanup.
	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than or as stringent as the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C) (Synthetic minor to avoid non-attainment provisions)	The VOC emission rate from this emissions unit shall not exceed 2.0 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions.

2. Additional Terms and Conditions

- 2.a The 1.66 lbs/hr OC emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.

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II. Operational Restrictions

1. The maximum annual isopropyl alcohol usage rate shall not exceed 400 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of isopropyl alcohol, in the first twelve months does not need to be established.
2. The maximum annual mold cleaner usage rate shall not exceed 131 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of mold cleaner, in the first twelve months does not need to be established.
3. The maximum annual primer usage rate shall not exceed 96 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of primer, in the first twelve months does not need to be established.
4. The OC content of the isopropyl alcohol shall not exceed 6.59 pounds of OC per gallon.
5. The OC content of the mold cleaner shall not exceed 5.7 pounds of OC per gallon.
6. The OC content of the primer shall not exceed 6.42 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 the injection mold operation:
 - c. The company identification for each coating and cleanup material employed.
 - d. The number of gallons for each coating and cleanup material employed.
 - e. The OC content for each coating and cleanup material employed, in pounds per gallon.
 - f. The total OC emission rate for all the coatings and cleanup materials employed, in pounds [summation of (b x c) for all coatings + summation of (b x c) for all cleanup materials].
2. The permittee shall collect and record the following information each month for the injection mold operation:
 - a. The rolling, 12-month summation of the monthly isopropyl alcohol usage, in gallons.

- b. The rolling, 12-month summation of the monthly mold cleaner usage, in gallons.
- c. The rolling, 12-month summation of the monthly primer usage, in gallons.
- d. The rolling, 12-month summation of the monthly OC mass emissions rate. i.e., $(1.c \times 2.a) + (1.c \times 2.b) + (1.c \times 2.c)$ divided by 2000 lbs/ton.

Issued: To be entered upon final issuance**IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the OC emission rate from the coatings and cleanup materials exceeded 40 pounds per day, and the actual daily OC emission rate for each such day.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12 month isopropyl alcohol, mold cleaner and primer usage limitations, in gallons and the actual rolling, 12-month usage summation, in gallons, for each such month.
3. The permittee shall notify the Director (RAPCA) in writing of any monthly record showing the use of noncomplying isopropyl, mold cleaner and primer, i.e., for VOC content. 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 30 days following the end of the calendar month.
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12 month OC emissions limitation, and the actual rolling, 12-month OC emissions for each such month.
5. The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.
6. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emissions limitations in section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation -
1.66 lbs OC/hr, including cleanup

Applicable Compliance Method -
Compliance with the hourly allowable OC emission limitation may be determined as follows:

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- i. multiply the maximum OC content of all the coatings (lbs/gallon) by the maximum coatings usage rate (gallons/hr);
- ii. multiply the maximum OC content of all the cleanup materials (lbs/gallon) by the maximum cleanup materials usage rate (gallons/hr); and
- iii. add i and ii.

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation based upon the results of emission tests conducted in accordance with Methods 1 - 4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- b. Emission Limitation-
40 lbs OC/day, including cleanup

Applicable Compliance Method-

Compliance with the daily allowable OC emission limitation above shall be based upon the record keeping requirements contained in Section A.III.1.d of this permit.

- c. Emission Limitation-
2.0 tons OC/yr, including cleanup as a rolling 12-month summation

Applicable Compliance Method-

Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements contained in Section A.III.2.d of this permit.

- d. Emission Limitation-
6.59 lbs OC/gallon of Isopropyl alcohol

5.7 lbs OC/gallon of Mold Cleaner

6.42 lbs OC/gallon of primer

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section III.1.c. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P038 - Injection Mold 550F	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

- The permit to install for emissions units P034 thru P050 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene

TLV (mg/m3): 188.4 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 4.86 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,856 ug/m3

MAGLC (ug/m3): 4486 ug/m3

Issued: To be entered upon final issuance

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.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

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 - Injection Mold 500C	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
	OAC rule 3745-21-07(G)(2)	The organic compound (OC) emissions from this emissions unit shall not exceed 1.66 lbs/hr and 40 lbs/day including cleanup.
	OAC rule 3745-31-05(C) (Synthetic minor to avoid non-attainment provisions)	The emission limitations specified by this rule are less stringent than or as stringent as the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
		The VOC emission rate from this emissions unit shall not exceed 2.0 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions.

2. Additional Terms and Conditions

- 2.a The 1.66 lbs/hr OC emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.

Issued: To be entered upon final issuance

II. Operational Restrictions

1. The maximum annual isopropyl alcohol usage rate shall not exceed 400 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of isopropyl alcohol, in the first twelve months does not need to be established.
2. The maximum annual mold cleaner usage rate shall not exceed 131 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of mold cleaner, in the first twelve months does not need to be established.
3. The maximum annual primer usage rate shall not exceed 96 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of primer, in the first twelve months does not need to be established.
4. The OC content of the isopropyl alcohol shall not exceed 6.59 pounds of OC per gallon.
5. The OC content of the mold cleaner shall not exceed 5.7 pounds of OC per gallon.
6. The OC content of the primer shall not exceed 6.42 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 the injection mold operation:
 - c. The company identification for each coating and cleanup material employed.
 - d. The number of gallons for each coating and cleanup material employed.
 - e. The OC content for each coating and cleanup material employed, in pounds per gallon.
 - f. The total OC emission rate for all the coatings and cleanup materials employed, in pounds [summation of (b x c) for all coatings + summation of (b x c) for all cleanup materials].
2. The permittee shall collect and record the following information each month for the injection mold operation:
 - a. The rolling, 12-month summation of the monthly isopropyl alcohol usage, in gallons.

- b. The rolling, 12-month summation of the monthly mold cleaner usage, in gallons.
- c. The rolling, 12-month summation of the monthly primer usage, in gallons.
- d. The rolling, 12-month summation of the monthly OC mass emissions rate. i.e., $(1.c \times 2.a) + (1.c \times 2.b) + (1.c \times 2.c)$ divided by 2000 lbs/ton.

Issued: To be entered upon final issuance**IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the OC emission rate from the coatings and cleanup materials exceeded 40 pounds per day, and the actual daily OC emission rate for each such day.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12 month isopropyl alcohol, mold cleaner and primer usage limitations, in gallons and the actual rolling, 12-month usage summation, in gallons, for each such month.
3. The permittee shall notify the Director (RAPCA) in writing of any monthly record showing the use of noncomplying isopropyl, mold cleaner and primer, i.e., for VOC content. 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 30 days following the end of the calendar month.
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12 month OC emissions limitation, and the actual rolling, 12-month OC emissions for each such month.
5. The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.
6. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emissions limitations in section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation -
1.66 lbs OC/hr, including cleanup

Applicable Compliance Method -
Compliance with the hourly allowable OC emission limitation may be determined as follows:

Issued: To be entered upon final issuance

- i. multiply the maximum OC content of all the coatings (lbs/gallon) by the maximum coatings usage rate (gallons/hr);
- ii. multiply the maximum OC content of all the cleanup materials (lbs/gallon) by the maximum cleanup materials usage rate (gallons/hr); and
- iii. add i and ii.

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation based upon the results of emission tests conducted in accordance with Methods 1 - 4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- b. Emission Limitation-
40 lbs OC/day, including cleanup

Applicable Compliance Method-

Compliance with the daily allowable OC emission limitation above shall be based upon the record keeping requirements contained in Section A.III.1.d of this permit.

- c. Emission Limitation-
2.0 tons OC/yr, including cleanup as a rolling 12-month summation

Applicable Compliance Method-

Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements contained in Section A.III.2.d of this permit.

- d. Emission Limitation-
6.59 lbs OC/gallon of Isopropyl alcohol

5.7 lbs OC/gallon of Mold Cleaner

6.42 lbs OC/gallon of primer

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section III.1.c. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

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 - Injection Mold 500C	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions units P034 thru P050 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene

TLV (mg/m3): 188.4 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 4.86 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,856 ug/m3

MAGLC (ug/m3): 4486 ug/m3

Issued: To be entered upon final issuance

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.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
 3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

Green Tokai Co Ltd
PTI Application: 08 04672
Issued

Facility ID: 0857011823

Emissions Unit ID: P039

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

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>
P040 - Injection Mold 500D	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
	OAC rule 3745-21-07(G)(2)	The organic compound (OC) emissions from this emissions unit shall not exceed 1.66 lbs/hr and 40 lbs/day including cleanup.
	OAC rule 3745-31-05(C) (Synthetic minor to avoid non-attainment provisions)	The emission limitations specified by this rule are less stringent than or as stringent as the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
		The VOC emission rate from this emissions unit shall not exceed 2.0 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions.

2. Additional Terms and Conditions

- 2.a The 1.66 lbs/hr OC emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.

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II. Operational Restrictions

1. The maximum annual isopropyl alcohol usage rate shall not exceed 400 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of isopropyl alcohol, in the first twelve months does not need to be established.
2. The maximum annual mold cleaner usage rate shall not exceed 131 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of mold cleaner, in the first twelve months does not need to be established.
3. The maximum annual primer usage rate shall not exceed 96 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of primer, in the first twelve months does not need to be established.
4. The OC content of the isopropyl alcohol shall not exceed 6.59 pounds of OC per gallon.
5. The OC content of the mold cleaner shall not exceed 5.7 pounds of OC per gallon.
6. The OC content of the primer shall not exceed 6.42 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 the injection mold operation:
 - c. The company identification for each coating and cleanup material employed.
 - d. The number of gallons for each coating and cleanup material employed.
 - e. The OC content for each coating and cleanup material employed, in pounds per gallon.
 - f. The total OC emission rate for all the coatings and cleanup materials employed, in pounds [summation of (b x c) for all coatings + summation of (b x c) for all cleanup materials].
2. The permittee shall collect and record the following information each month for the injection mold operation:
 - a. The rolling, 12-month summation of the monthly isopropyl alcohol usage, in gallons.

- b. The rolling, 12-month summation of the monthly mold cleaner usage, in gallons.
- c. The rolling, 12-month summation of the monthly primer usage, in gallons.
- d. The rolling, 12-month summation of the monthly OC mass emissions rate. i.e., $(1.c \times 2.a) + (1.c \times 2.b) + (1.c \times 2.c)$ divided by 2000 lbs/ton.

Issued: To be entered upon final issuance**IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the OC emission rate from the coatings and cleanup materials exceeded 40 pounds per day, and the actual daily OC emission rate for each such day.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12 month isopropyl alcohol, mold cleaner and primer usage limitations, in gallons and the actual rolling, 12-month usage summation, in gallons, for each such month.
3. The permittee shall notify the Director (RAPCA) in writing of any monthly record showing the use of noncomplying isopropyl, mold cleaner and primer, i.e., for VOC content. 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 30 days following the end of the calendar month.
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12 month OC emissions limitation, and the actual rolling, 12-month OC emissions for each such month.
5. The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.
6. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emissions limitations in section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation -
1.66 lbs OC/hr, including cleanup

Applicable Compliance Method -
Compliance with the hourly allowable OC emission limitation may be determined as follows:

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- i. multiply the maximum OC content of all the coatings (lbs/gallon) by the maximum coatings usage rate (gallons/hr);
- ii. multiply the maximum OC content of all the cleanup materials (lbs/gallon) by the maximum cleanup materials usage rate (gallons/hr); and
- iii. add i and ii.

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation based upon the results of emission tests conducted in accordance with Methods 1 - 4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- b. Emission Limitation-
40 lbs OC/day, including cleanup

Applicable Compliance Method-

Compliance with the daily allowable OC emission limitation above shall be based upon the record keeping requirements contained in Section A.III.1.d of this permit.

- c. Emission Limitation-
2.0 tons OC/yr, including cleanup as a rolling 12-month summation

Applicable Compliance Method-

Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements contained in Section A.III.2.d of this permit.

- d. Emission Limitation-
6.59 lbs OC/gallon of Isopropyl alcohol

5.7 lbs OC/gallon of Mold Cleaner

6.42 lbs OC/gallon of primer

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section III.1.c. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

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>
P040 - Injection Mold 500D	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions units P034 thru P050 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene

TLV (mg/m3): 188.4 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 4.86 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,856 ug/m3

MAGLC (ug/m3): 4486 ug/m3

Issued: To be entered upon final issuance

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.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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Emissions Unit ID: P040

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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Emissions Unit ID: P041

Issued: To be entered upon final issuance

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>
P041 - Injection Mold 610C	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C). The organic compound (OC) emissions from this emissions unit shall not exceed 1.66 lbs/hr and 40 lbs/day including cleanup.
	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than or as stringent as the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C) (Synthetic minor to avoid non-attainment provisions)	The VOC emission rate from this emissions unit shall not exceed 2.0 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions.

2. Additional Terms and Conditions

- 2.a The 1.66 lbs/hr OC emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.

Issued: To be entered upon final issuance

II. Operational Restrictions

1. The maximum annual isopropyl alcohol usage rate shall not exceed 400 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of isopropyl alcohol, in the first twelve months does not need to be established.
2. The maximum annual mold cleaner usage rate shall not exceed 131 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of mold cleaner, in the first twelve months does not need to be established.
3. The maximum annual primer usage rate shall not exceed 96 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of primer, in the first twelve months does not need to be established.
4. The OC content of the isopropyl alcohol shall not exceed 6.59 pounds of OC per gallon.
5. The OC content of the mold cleaner shall not exceed 5.7 pounds of OC per gallon.
6. The OC content of the primer shall not exceed 6.42 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 the injection mold operation:
 - c. The company identification for each coating and cleanup material employed.
 - d. The number of gallons for each coating and cleanup material employed.
 - e. The OC content for each coating and cleanup material employed, in pounds per gallon.
 - f. The total OC emission rate for all the coatings and cleanup materials employed, in pounds [summation of (b x c) for all coatings + summation of (b x c) for all cleanup materials].
2. The permittee shall collect and record the following information each month for the injection mold operation:
 - a. The rolling, 12-month summation of the monthly isopropyl alcohol usage, in gallons.

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- b. The rolling, 12-month summation of the monthly mold cleaner usage, in gallons.
- c. The rolling, 12-month summation of the monthly primer usage, in gallons.
- d. The rolling, 12-month summation of the monthly OC mass emissions rate. i.e., $(1.c \times 2.a) + (1.c \times 2.b) + (1.c \times 2.c)$ divided by 2000 lbs/ton.

Issued: To be entered upon final issuance**IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the OC emission rate from the coatings and cleanup materials exceeded 40 pounds per day, and the actual daily OC emission rate for each such day.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12 month isopropyl alcohol, mold cleaner and primer usage limitations, in gallons and the actual rolling, 12-month usage summation, in gallons, for each such month.
3. The permittee shall notify the Director (RAPCA) in writing of any monthly record showing the use of noncomplying isopropyl, mold cleaner and primer, i.e., for VOC content. 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 30 days following the end of the calendar month.
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12 month OC emissions limitation, and the actual rolling, 12-month OC emissions for each such month.
5. The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.
6. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emissions limitations in section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation -
1.66 lbs OC/hr, including cleanup

Applicable Compliance Method -
Compliance with the hourly allowable OC emission limitation may be determined as follows:

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- i. multiply the maximum OC content of all the coatings (lbs/gallon) by the maximum coatings usage rate (gallons/hr);
- ii. multiply the maximum OC content of all the cleanup materials (lbs/gallon) by the maximum cleanup materials usage rate (gallons/hr); and
- iii. add i and ii.

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation based upon the results of emission tests conducted in accordance with Methods 1 - 4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- b. Emission Limitation-
40 lbs OC/day, including cleanup

Applicable Compliance Method-

Compliance with the daily allowable OC emission limitation above shall be based upon the record keeping requirements contained in Section A.III.1.d of this permit.

- c. Emission Limitation-
2.0 tons OC/yr, including cleanup as a rolling 12-month summation

Applicable Compliance Method-

Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements contained in Section A.III.2.d of this permit.

- d. Emission Limitation-
6.59 lbs OC/gallon of Isopropyl alcohol

5.7 lbs OC/gallon of Mold Cleaner

6.42 lbs OC/gallon of primer

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section III.1.c. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

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>
P041 - Injection Mold 610C	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

- 1. The permit to install for emissions units P034 thru P050 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene

TLV (mg/m3): 188.4 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 4.86 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,856 ug/m3

MAGLC (ug/m3): 4486 ug/m3

Issued: To be entered upon final issuance

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.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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Facility ID: 0857011823

Emissions Unit ID: P041

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

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>
P042 - Injection Mold 610B	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
	OAC rule 3745-21-07(G)(2)	The organic compound (OC) emissions from this emissions unit shall not exceed 1.66 lbs/hr and 40 lbs/day including cleanup.
	OAC rule 3745-31-05(C) (Synthetic minor to avoid non-attainment provisions)	The emission limitations specified by this rule are less stringent than or as stringent as the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
		The VOC emission rate from this emissions unit shall not exceed 2.0 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions.

2. Additional Terms and Conditions

- 2.a The 1.66 lbs/hr OC emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.

Issued: To be entered upon final issuance

II. Operational Restrictions

1. The maximum annual isopropyl alcohol usage rate shall not exceed 400 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of isopropyl alcohol, in the first twelve months does not need to be established.
2. The maximum annual mold cleaner usage rate shall not exceed 131 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of mold cleaner, in the first twelve months does not need to be established.
3. The maximum annual primer usage rate shall not exceed 96 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of primer, in the first twelve months does not need to be established.
4. The OC content of the isopropyl alcohol shall not exceed 6.59 pounds of OC per gallon.
5. The OC content of the mold cleaner shall not exceed 5.7 pounds of OC per gallon.
6. The OC content of the primer shall not exceed 6.42 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 the injection mold operation:
 - c. The company identification for each coating and cleanup material employed.
 - d. The number of gallons for each coating and cleanup material employed.
 - e. The OC content for each coating and cleanup material employed, in pounds per gallon.
 - f. The total OC emission rate for all the coatings and cleanup materials employed, in pounds [summation of (b x c) for all coatings + summation of (b x c) for all cleanup materials].
2. The permittee shall collect and record the following information each month for the injection mold operation:
 - a. The rolling, 12-month summation of the monthly isopropyl alcohol usage, in gallons.

- b. The rolling, 12-month summation of the monthly mold cleaner usage, in gallons.
- c. The rolling, 12-month summation of the monthly primer usage, in gallons.
- d. The rolling, 12-month summation of the monthly OC mass emissions rate. i.e., $(1.c \times 2.a) + (1.c \times 2.b) + (1.c \times 2.c)$ divided by 2000 lbs/ton.

Issued: To be entered upon final issuance**IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the OC emission rate from the coatings and cleanup materials exceeded 40 pounds per day, and the actual daily OC emission rate for each such day.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12 month isopropyl alcohol, mold cleaner and primer usage limitations, in gallons and the actual rolling, 12-month usage summation, in gallons, for each such month.
3. The permittee shall notify the Director (RAPCA) in writing of any monthly record showing the use of noncomplying isopropyl, mold cleaner and primer, i.e., for VOC content. 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 30 days following the end of the calendar month.
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12 month OC emissions limitation, and the actual rolling, 12-month OC emissions for each such month.
5. The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.
6. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emissions limitations in section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation -
1.66 lbs OC/hr, including cleanup

Applicable Compliance Method -
Compliance with the hourly allowable OC emission limitation may be determined as follows:

Issued: To be entered upon final issuance

- i. multiply the maximum OC content of all the coatings (lbs/gallon) by the maximum coatings usage rate (gallons/hr);
- ii. multiply the maximum OC content of all the cleanup materials (lbs/gallon) by the maximum cleanup materials usage rate (gallons/hr); and
- iii. add i and ii.

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation based upon the results of emission tests conducted in accordance with Methods 1 - 4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- b. Emission Limitation-
40 lbs OC/day, including cleanup

Applicable Compliance Method-

Compliance with the daily allowable OC emission limitation above shall be based upon the record keeping requirements contained in Section A.III.1.d of this permit.

- c. Emission Limitation-
2.0 tons OC/yr, including cleanup as a rolling 12-month summation

Applicable Compliance Method-

Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements contained in Section A.III.2.d of this permit.

- d. Emission Limitation-
6.59 lbs OC/gallon of Isopropyl alcohol

5.7 lbs OC/gallon of Mold Cleaner

6.42 lbs OC/gallon of primer

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section III.1.c. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

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>
P042 - Injection Mold 610B	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

- 1. The permit to install for emissions units P034 thru P050 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene

TLV (mg/m3): 188.4 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 4.86 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,856 ug/m3

MAGLC (ug/m3): 4486 ug/m3

Issued: To be entered upon final issuance

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.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
 3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

Green Tokai Co Ltd
PTI Application: 08 04672
Issued

Facility ID: 0857011823

Emissions Unit ID: P042

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

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>
P043 - Injection Mold 500A	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
	OAC rule 3745-21-07(G)(2)	The organic compound (OC) emissions from this emissions unit shall not exceed 1.66 lbs/hr and 40 lbs/day including cleanup.
	OAC rule 3745-31-05(C) (Synthetic minor to avoid non-attainment provisions)	The emission limitations specified by this rule are less stringent than or as stringent as the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
		The VOC emission rate from this emissions unit shall not exceed 2.0 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions.

2. Additional Terms and Conditions

- 2.a The 1.66 lbs/hr OC emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.

Issued: To be entered upon final issuance**II. Operational Restrictions**

1. The maximum annual isopropyl alcohol usage rate shall not exceed 400 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of isopropyl alcohol, in the first twelve months does not need to be established.
2. The maximum annual mold cleaner usage rate shall not exceed 131 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of mold cleaner, in the first twelve months does not need to be established.
3. The maximum annual primer usage rate shall not exceed 96 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of primer, in the first twelve months does not need to be established.
4. The OC content of the isopropyl alcohol shall not exceed 6.59 pounds of OC per gallon.
5. The OC content of the mold cleaner shall not exceed 5.7 pounds of OC per gallon.
6. The OC content of the primer shall not exceed 6.42 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 the injection mold operation:
 - c. The company identification for each coating and cleanup material employed.
 - d. The number of gallons for each coating and cleanup material employed.
 - e. The OC content for each coating and cleanup material employed, in pounds per gallon.
 - f. The total OC emission rate for all the coatings and cleanup materials employed, in pounds [summation of (b x c) for all coatings + summation of (b x c) for all cleanup materials].
2. The permittee shall collect and record the following information each month for the injection mold operation:
 - a. The rolling, 12-month summation of the monthly isopropyl alcohol usage, in gallons.

- b. The rolling, 12-month summation of the monthly mold cleaner usage, in gallons.
- c. The rolling, 12-month summation of the monthly primer usage, in gallons.
- d. The rolling, 12-month summation of the monthly OC mass emissions rate. i.e., $(1.c \times 2.a) + (1.c \times 2.b) + (1.c \times 2.c)$ divided by 2000 lbs/ton.

Issued: To be entered upon final issuance**IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the OC emission rate from the coatings and cleanup materials exceeded 40 pounds per day, and the actual daily OC emission rate for each such day.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12 month isopropyl alcohol, mold cleaner and primer usage limitations, in gallons and the actual rolling, 12-month usage summation, in gallons, for each such month.
3. The permittee shall notify the Director (RAPCA) in writing of any monthly record showing the use of noncomplying isopropyl, mold cleaner and primer, i.e., for VOC content. 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 30 days following the end of the calendar month.
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12 month OC emissions limitation, and the actual rolling, 12-month OC emissions for each such month.
5. The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.
6. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emissions limitations in section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation -
1.66 lbs OC/hr, including cleanup

Applicable Compliance Method -
Compliance with the hourly allowable OC emission limitation may be determined as follows:

Issued: To be entered upon final issuance

- i. multiply the maximum OC content of all the coatings (lbs/gallon) by the maximum coatings usage rate (gallons/hr);
- ii. multiply the maximum OC content of all the cleanup materials (lbs/gallon) by the maximum cleanup materials usage rate (gallons/hr); and
- iii. add i and ii.

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation based upon the results of emission tests conducted in accordance with Methods 1 - 4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- b. Emission Limitation-
40 lbs OC/day, including cleanup

Applicable Compliance Method-

Compliance with the daily allowable OC emission limitation above shall be based upon the record keeping requirements contained in Section A.III.1.d of this permit.

- c. Emission Limitation-
2.0 tons OC/yr, including cleanup as a rolling 12-month summation

Applicable Compliance Method-

Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements contained in Section A.III.2.d of this permit.

- d. Emission Limitation-
6.59 lbs OC/gallon of Isopropyl alcohol

5.7 lbs OC/gallon of Mold Cleaner

6.42 lbs OC/gallon of primer

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section III.1.c. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

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>
P043 - Injection Mold 500A	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

- 1. The permit to install for emissions units P034 thru P050 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene

TLV (mg/m3): 188.4 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 4.86 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,856 ug/m3

MAGLC (ug/m3): 4486 ug/m3

Issued: To be entered upon final issuance

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.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

Green Tokai Co Ltd
PTI Application: 08 04672
Issued

Facility ID: 0857011823

Emissions Unit ID: P043

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

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>
P044 - Injection Mold 610A	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
	OAC rule 3745-21-07(G)(2)	The organic compound (OC) emissions from this emissions unit shall not exceed 1.66 lbs/hr and 40 lbs/day including cleanup.
	OAC rule 3745-31-05(C) (Synthetic minor to avoid non-attainment provisions)	The emission limitations specified by this rule are less stringent than or as stringent as the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
		The VOC emission rate from this emissions unit shall not exceed 2.0 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions.

2. Additional Terms and Conditions

- 2.a The 1.66 lbs/hr OC emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.

Issued: To be entered upon final issuance

II. Operational Restrictions

1. The maximum annual isopropyl alcohol usage rate shall not exceed 400 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of isopropyl alcohol, in the first twelve months does not need to be established.
2. The maximum annual mold cleaner usage rate shall not exceed 131 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of mold cleaner, in the first twelve months does not need to be established.
3. The maximum annual primer usage rate shall not exceed 96 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of primer, in the first twelve months does not need to be established.
4. The OC content of the isopropyl alcohol shall not exceed 6.59 pounds of OC per gallon.
5. The OC content of the mold cleaner shall not exceed 5.7 pounds of OC per gallon.
6. The OC content of the primer shall not exceed 6.42 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 the injection mold operation:
 - c. The company identification for each coating and cleanup material employed.
 - d. The number of gallons for each coating and cleanup material employed.
 - e. The OC content for each coating and cleanup material employed, in pounds per gallon.
 - f. The total OC emission rate for all the coatings and cleanup materials employed, in pounds [summation of (b x c) for all coatings + summation of (b x c) for all cleanup materials].
2. The permittee shall collect and record the following information each month for the injection mold operation:
 - a. The rolling, 12-month summation of the monthly isopropyl alcohol usage, in gallons.

- b. The rolling, 12-month summation of the monthly mold cleaner usage, in gallons.
- c. The rolling, 12-month summation of the monthly primer usage, in gallons.
- d. The rolling, 12-month summation of the monthly OC mass emissions rate. i.e., $(1.c \times 2.a) + (1.c \times 2.b) + (1.c \times 2.c)$ divided by 2000 lbs/ton.

Issued: To be entered upon final issuance**IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the OC emission rate from the coatings and cleanup materials exceeded 40 pounds per day, and the actual daily OC emission rate for each such day.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12 month isopropyl alcohol, mold cleaner and primer usage limitations, in gallons and the actual rolling, 12-month usage summation, in gallons, for each such month.
3. The permittee shall notify the Director (RAPCA) in writing of any monthly record showing the use of noncomplying isopropyl, mold cleaner and primer, i.e., for VOC content. 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 30 days following the end of the calendar month.
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12 month OC emissions limitation, and the actual rolling, 12-month OC emissions for each such month.
5. The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.
6. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emissions limitations in section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation -
1.66 lbs OC/hr, including cleanup

Applicable Compliance Method -
Compliance with the hourly allowable OC emission limitation may be determined as follows:

Issued: To be entered upon final issuance

- i. multiply the maximum OC content of all the coatings (lbs/gallon) by the maximum coatings usage rate (gallons/hr);
- ii. multiply the maximum OC content of all the cleanup materials (lbs/gallon) by the maximum cleanup materials usage rate (gallons/hr); and
- iii. add i and ii.

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation based upon the results of emission tests conducted in accordance with Methods 1 - 4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- b. Emission Limitation-
40 lbs OC/day, including cleanup

Applicable Compliance Method-
Compliance with the daily allowable OC emission limitation above shall be based upon the record keeping requirements contained in Section A.III.1.d of this permit.

- c. Emission Limitation-
2.0 tons OC/yr, including cleanup as a rolling 12-month summation

Applicable Compliance Method-
Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements contained in Section A.III.2.d of this permit.

- d. Emission Limitation-
6.59 lbs OC/gallon of Isopropyl alcohol

5.7 lbs OC/gallon of Mold Cleaner

6.42 lbs OC/gallon of primer

Applicable Compliance Method-
Compliance shall be based upon the record keeping requirements specified in Section III.1.c. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

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>
P044 - Injection Mold 610A	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions units P034 thru P050 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene

TLV (mg/m3): 188.4 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 4.86 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,856 ug/m3

MAGLC (ug/m3): 4486 ug/m3

Issued: To be entered upon final issuance

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.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

Green Tokai Co Ltd
PTI Application: 08 04672
Issued

Facility ID: 0857011823

Emissions Unit ID: P044

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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Emissions Unit ID: P045

Issued: To be entered upon final issuance

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>
P045 - Injection Mold 610E	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
	OAC rule 3745-21-07(G)(2)	The organic compound (OC) emissions from this emissions unit shall not exceed 1.66 lbs/hr and 40 lbs/day including cleanup.
	OAC rule 3745-31-05(C) (Synthetic minor to avoid non-attainment provisions)	The emission limitations specified by this rule are less stringent than or as stringent as the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
		The VOC emission rate from this emissions unit shall not exceed 2.0 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions.

2. Additional Terms and Conditions

- 2.a The 1.66 lbs/hr OC emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.

Issued: To be entered upon final issuance**II. Operational Restrictions**

1. The maximum annual isopropyl alcohol usage rate shall not exceed 400 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of isopropyl alcohol, in the first twelve months does not need to be established.
2. The maximum annual mold cleaner usage rate shall not exceed 131 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of mold cleaner, in the first twelve months does not need to be established.
3. The maximum annual primer usage rate shall not exceed 96 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of primer, in the first twelve months does not need to be established.
4. The OC content of the isopropyl alcohol shall not exceed 6.59 pounds of OC per gallon.
5. The OC content of the mold cleaner shall not exceed 5.7 pounds of OC per gallon.
6. The OC content of the primer shall not exceed 6.42 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 the injection mold operation:
 - c. The company identification for each coating and cleanup material employed.
 - d. The number of gallons for each coating and cleanup material employed.
 - e. The OC content for each coating and cleanup material employed, in pounds per gallon.
 - f. The total OC emission rate for all the coatings and cleanup materials employed, in pounds [summation of (b x c) for all coatings + summation of (b x c) for all cleanup materials].
2. The permittee shall collect and record the following information each month for the injection mold operation:
 - a. The rolling, 12-month summation of the monthly isopropyl alcohol usage, in gallons.

- b. The rolling, 12-month summation of the monthly mold cleaner usage, in gallons.
- c. The rolling, 12-month summation of the monthly primer usage, in gallons.
- d. The rolling, 12-month summation of the monthly OC mass emissions rate. i.e., $(1.c \times 2.a) + (1.c \times 2.b) + (1.c \times 2.c)$ divided by 2000 lbs/ton.

Issued: To be entered upon final issuance**IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the OC emission rate from the coatings and cleanup materials exceeded 40 pounds per day, and the actual daily OC emission rate for each such day.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12 month isopropyl alcohol, mold cleaner and primer usage limitations, in gallons and the actual rolling, 12-month usage summation, in gallons, for each such month.
3. The permittee shall notify the Director (RAPCA) in writing of any monthly record showing the use of noncomplying isopropyl, mold cleaner and primer, i.e., for VOC content. 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 30 days following the end of the calendar month.
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12 month OC emissions limitation, and the actual rolling, 12-month OC emissions for each such month.
5. The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.
6. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emissions limitations in section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation -
1.66 lbs OC/hr, including cleanup

Applicable Compliance Method -
Compliance with the hourly allowable OC emission limitation may be determined as follows:

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- i. multiply the maximum OC content of all the coatings (lbs/gallon) by the maximum coatings usage rate (gallons/hr);
- ii. multiply the maximum OC content of all the cleanup materials (lbs/gallon) by the maximum cleanup materials usage rate (gallons/hr); and
- iii. add i and ii.

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation based upon the results of emission tests conducted in accordance with Methods 1 - 4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- b. Emission Limitation-
40 lbs OC/day, including cleanup

Applicable Compliance Method-
Compliance with the daily allowable OC emission limitation above shall be based upon the record keeping requirements contained in Section A.III.1.d of this permit.

- c. Emission Limitation-
2.0 tons OC/yr, including cleanup as a rolling 12-month summation

Applicable Compliance Method-
Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements contained in Section A.III.2.d of this permit.

- d. Emission Limitation-
6.59 lbs OC/gallon of Isopropyl alcohol

5.7 lbs OC/gallon of Mold Cleaner

6.42 lbs OC/gallon of primer

Applicable Compliance Method-
Compliance shall be based upon the record keeping requirements specified in Section III.1.c. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

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>
P045 - Injection Mold 610E	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions units P034 thru P050 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene

TLV (mg/m3): 188.4 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 4.86 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,856 ug/m3

MAGLC (ug/m3): 4486 ug/m3

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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.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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Facility ID: 0857011823

Emissions Unit ID: P045

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

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>
P046 - Injection Mold 500H	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
	OAC rule 3745-21-07(G)(2)	The organic compound (OC) emissions from this emissions unit shall not exceed 1.66 lbs/hr and 40 lbs/day including cleanup.
	OAC rule 3745-31-05(C) (Synthetic minor to avoid non-attainment provisions)	The emission limitations specified by this rule are less stringent than or as stringent as the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
		The VOC emission rate from this emissions unit shall not exceed 2.0 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions.

2. Additional Terms and Conditions

- 2.a The 1.66 lbs/hr OC emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.

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II. Operational Restrictions

1. The maximum annual isopropyl alcohol usage rate shall not exceed 400 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of isopropyl alcohol, in the first twelve months does not need to be established.
2. The maximum annual mold cleaner usage rate shall not exceed 131 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of mold cleaner, in the first twelve months does not need to be established.
3. The maximum annual primer usage rate shall not exceed 96 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of primer, in the first twelve months does not need to be established.
4. The OC content of the isopropyl alcohol shall not exceed 6.59 pounds of OC per gallon.
5. The OC content of the mold cleaner shall not exceed 5.7 pounds of OC per gallon.
6. The OC content of the primer shall not exceed 6.42 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 the injection mold operation:
 - c. The company identification for each coating and cleanup material employed.
 - d. The number of gallons for each coating and cleanup material employed.
 - e. The OC content for each coating and cleanup material employed, in pounds per gallon.
 - f. The total OC emission rate for all the coatings and cleanup materials employed, in pounds [summation of (b x c) for all coatings + summation of (b x c) for all cleanup materials].
2. The permittee shall collect and record the following information each month for the injection mold operation:
 - a. The rolling, 12-month summation of the monthly isopropyl alcohol usage, in gallons.

- b. The rolling, 12-month summation of the monthly mold cleaner usage, in gallons.
- c. The rolling, 12-month summation of the monthly primer usage, in gallons.
- d. The rolling, 12-month summation of the monthly OC mass emissions rate. i.e., $(1.c \times 2.a) + (1.c \times 2.b) + (1.c \times 2.c)$ divided by 2000 lbs/ton.

Issued: To be entered upon final issuance**IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the OC emission rate from the coatings and cleanup materials exceeded 40 pounds per day, and the actual daily OC emission rate for each such day.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12 month isopropyl alcohol, mold cleaner and primer usage limitations, in gallons and the actual rolling, 12-month usage summation, in gallons, for each such month.
3. The permittee shall notify the Director (RAPCA) in writing of any monthly record showing the use of noncomplying isopropyl, mold cleaner and primer, i.e., for VOC content. 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 30 days following the end of the calendar month.
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12 month OC emissions limitation, and the actual rolling, 12-month OC emissions for each such month.
5. The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.
6. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emissions limitations in section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation -
1.66 lbs OC/hr, including cleanup

Applicable Compliance Method -
Compliance with the hourly allowable OC emission limitation may be determined as follows:

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- i. multiply the maximum OC content of all the coatings (lbs/gallon) by the maximum coatings usage rate (gallons/hr);
- ii. multiply the maximum OC content of all the cleanup materials (lbs/gallon) by the maximum cleanup materials usage rate (gallons/hr); and
- iii. add i and ii.

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation based upon the results of emission tests conducted in accordance with Methods 1 - 4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- b. Emission Limitation-
40 lbs OC/day, including cleanup

Applicable Compliance Method-

Compliance with the daily allowable OC emission limitation above shall be based upon the record keeping requirements contained in Section A.III.1.d of this permit.

- c. Emission Limitation-
2.0 tons OC/yr, including cleanup as a rolling 12-month summation

Applicable Compliance Method-

Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements contained in Section A.III.2.d of this permit.

- d. Emission Limitation-
6.59 lbs OC/gallon of Isopropyl alcohol

5.7 lbs OC/gallon of Mold Cleaner

6.42 lbs OC/gallon of primer

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section III.1.c. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

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>
P046 - Injection Mold 500H	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions units P034 thru P050 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene

TLV (mg/m3): 188.4 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 4.86 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,856 ug/m3

MAGLC (ug/m3): 4486 ug/m3

Issued: To be entered upon final issuance

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.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

Green Tokai Co Ltd
PTI Application: 08 04673
Issued

Facility ID: 0857011823

Emissions Unit ID: P046

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

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>
P047 - Injection Mold 2800	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C). The organic compound (OC) emissions from this emissions unit shall not exceed 1.66 lbs/hr and 40 lbs/day including cleanup.
	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than or as stringent as the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C) (Synthetic minor to avoid non-attainment provisions)	The VOC emission rate from this emissions unit shall not exceed 2.0 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions.

2. Additional Terms and Conditions

- 2.a The 1.66 lbs/hr OC emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.

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II. Operational Restrictions

1. The maximum annual isopropyl alcohol usage rate shall not exceed 400 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of isopropyl alcohol, in the first twelve months does not need to be established.
2. The maximum annual mold cleaner usage rate shall not exceed 131 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of mold cleaner, in the first twelve months does not need to be established.
3. The maximum annual primer usage rate shall not exceed 96 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of primer, in the first twelve months does not need to be established.
4. The OC content of the isopropyl alcohol shall not exceed 6.59 pounds of OC per gallon.
5. The OC content of the mold cleaner shall not exceed 5.7 pounds of OC per gallon.
6. The OC content of the primer shall not exceed 6.42 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 the injection mold operation:
 - c. The company identification for each coating and cleanup material employed.
 - d. The number of gallons for each coating and cleanup material employed.
 - e. The OC content for each coating and cleanup material employed, in pounds per gallon.
 - f. The total OC emission rate for all the coatings and cleanup materials employed, in pounds [summation of (b x c) for all coatings + summation of (b x c) for all cleanup materials].
2. The permittee shall collect and record the following information each month for the injection mold operation:
 - a. The rolling, 12-month summation of the monthly isopropyl alcohol usage, in gallons.

- b. The rolling, 12-month summation of the monthly mold cleaner usage, in gallons.
- c. The rolling, 12-month summation of the monthly primer usage, in gallons.
- d. The rolling, 12-month summation of the monthly OC mass emissions rate. i.e., $(1.c \times 2.a) + (1.c \times 2.b) + (1.c \times 2.c)$ divided by 2000 lbs/ton.

Issued: To be entered upon final issuance**IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the OC emission rate from the coatings and cleanup materials exceeded 40 pounds per day, and the actual daily OC emission rate for each such day.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12 month isopropyl alcohol, mold cleaner and primer usage limitations, in gallons and the actual rolling, 12-month usage summation, in gallons, for each such month.
3. The permittee shall notify the Director (RAPCA) in writing of any monthly record showing the use of noncomplying isopropyl, mold cleaner and primer, i.e., for VOC content. 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 30 days following the end of the calendar month.
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12 month OC emissions limitation, and the actual rolling, 12-month OC emissions for each such month.
5. The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.
6. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emissions limitations in section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation -
1.66 lbs OC/hr, including cleanup

Applicable Compliance Method -
Compliance with the hourly allowable OC emission limitation may be determined as follows:

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- i. multiply the maximum OC content of all the coatings (lbs/gallon) by the maximum coatings usage rate (gallons/hr);
- ii. multiply the maximum OC content of all the cleanup materials (lbs/gallon) by the maximum cleanup materials usage rate (gallons/hr); and
- iii. add i and ii.

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation based upon the results of emission tests conducted in accordance with Methods 1 - 4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- b. Emission Limitation-
40 lbs OC/day, including cleanup

Applicable Compliance Method-
Compliance with the daily allowable OC emission limitation above shall be based upon the record keeping requirements contained in Section A.III.1.d of this permit.

- c. Emission Limitation-
2.0 tons OC/yr, including cleanup as a rolling 12-month summation

Applicable Compliance Method-
Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements contained in Section A.III.2.d of this permit.

- d. Emission Limitation-
6.59 lbs OC/gallon of Isopropyl alcohol

5.7 lbs OC/gallon of Mold Cleaner

6.42 lbs OC/gallon of primer

Applicable Compliance Method-
Compliance shall be based upon the record keeping requirements specified in Section III.1.c. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

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>
P047 - Injection Mold 2800	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions units P034 thru P050 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene

TLV (mg/m3): 188.4 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 4.86 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,856 ug/m3

MAGLC (ug/m3): 4486 ug/m3

Issued: To be entered upon final issuance

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.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
 3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

Green Tokai Co Ltd
PTI Application: 08 04673
Issued

Facility ID: 0857011823

Emissions Unit ID: P047

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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Emissions Unit ID: P048

Issued: To be entered upon final issuance

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>
P048 - Injection Mold 3350	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
	OAC rule 3745-21-07(G)(2)	The organic compound (OC) emissions from this emissions unit shall not exceed 1.66 lbs/hr and 40 lbs/day including cleanup.
	OAC rule 3745-31-05(C) (Synthetic minor to avoid non-attainment provisions)	The emission limitations specified by this rule are less stringent than or as stringent as the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
		The VOC emission rate from this emissions unit shall not exceed 2.0 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions.

2. Additional Terms and Conditions

- 2.a The 1.66 lbs/hr OC emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.

Issued: To be entered upon final issuance**II. Operational Restrictions**

1. The maximum annual isopropyl alcohol usage rate shall not exceed 400 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of isopropyl alcohol, in the first twelve months does not need to be established.
2. The maximum annual mold cleaner usage rate shall not exceed 131 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of mold cleaner, in the first twelve months does not need to be established.
3. The maximum annual primer usage rate shall not exceed 96 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of primer, in the first twelve months does not need to be established.
4. The OC content of the isopropyl alcohol shall not exceed 6.59 pounds of OC per gallon.
5. The OC content of the mold cleaner shall not exceed 5.7 pounds of OC per gallon.
6. The OC content of the primer shall not exceed 6.42 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 the injection mold operation:
 - c. The company identification for each coating and cleanup material employed.
 - d. The number of gallons for each coating and cleanup material employed.
 - e. The OC content for each coating and cleanup material employed, in pounds per gallon.
 - f. The total OC emission rate for all the coatings and cleanup materials employed, in pounds [summation of (b x c) for all coatings + summation of (b x c) for all cleanup materials].
2. The permittee shall collect and record the following information each month for the injection mold operation:
 - a. The rolling, 12-month summation of the monthly isopropyl alcohol usage, in gallons.

- b. The rolling, 12-month summation of the monthly mold cleaner usage, in gallons.
- c. The rolling, 12-month summation of the monthly primer usage, in gallons.
- d. The rolling, 12-month summation of the monthly OC mass emissions rate. i.e., $(1.c \times 2.a) + (1.c \times 2.b) + (1.c \times 2.c)$ divided by 2000 lbs/ton.

Issued: To be entered upon final issuance**IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the OC emission rate from the coatings and cleanup materials exceeded 40 pounds per day, and the actual daily OC emission rate for each such day.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12 month isopropyl alcohol, mold cleaner and primer usage limitations, in gallons and the actual rolling, 12-month usage summation, in gallons, for each such month.
3. The permittee shall notify the Director (RAPCA) in writing of any monthly record showing the use of noncomplying isopropyl, mold cleaner and primer, i.e., for VOC content. 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 30 days following the end of the calendar month.
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12 month OC emissions limitation, and the actual rolling, 12-month OC emissions for each such month.
5. The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.
6. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emissions limitations in section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation -
1.66 lbs OC/hr, including cleanup

Applicable Compliance Method -
Compliance with the hourly allowable OC emission limitation may be determined as follows:

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- i. multiply the maximum OC content of all the coatings (lbs/gallon) by the maximum coatings usage rate (gallons/hr);
- ii. multiply the maximum OC content of all the cleanup materials (lbs/gallon) by the maximum cleanup materials usage rate (gallons/hr); and
- iii. add i and ii.

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation based upon the results of emission tests conducted in accordance with Methods 1 - 4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- b. Emission Limitation-
40 lbs OC/day, including cleanup

Applicable Compliance Method-

Compliance with the daily allowable OC emission limitation above shall be based upon the record keeping requirements contained in Section A.III.1.d of this permit.

- c. Emission Limitation-
2.0 tons OC/yr, including cleanup as a rolling 12-month summation

Applicable Compliance Method-

Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements contained in Section A.III.2.d of this permit.

- d. Emission Limitation-
6.59 lbs OC/gallon of Isopropyl alcohol

5.7 lbs OC/gallon of Mold Cleaner

6.42 lbs OC/gallon of primer

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section III.1.c. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

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>
P048 - Injection Mold 3350	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions units P034 thru P050 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene

TLV (mg/m3): 188.4 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 4.86 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,856 ug/m3

MAGLC (ug/m3): 4486 ug/m3

Issued: To be entered upon final issuance

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.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
 3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

Green Tokai Co Ltd
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Issued

Facility ID: 0857011823

Emissions Unit ID: P048

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Green
PTI A

Emissions Unit ID: P049

Issued: To be entered upon final issuance

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>
P049 - Injection Mold 1100	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
	OAC rule 3745-21-07(G)(2)	The organic compound (OC) emissions from this emissions unit shall not exceed 1.66 lbs/hr and 40 lbs/day including cleanup.
	OAC rule 3745-31-05(C) (Synthetic minor to avoid non-attainment provisions)	The emission limitations specified by this rule are less stringent than or as stringent as the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
		The VOC emission rate from this emissions unit shall not exceed 2.0 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions.

2. Additional Terms and Conditions

- 2.a The 1.66 lbs/hr OC emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.

Issued: To be entered upon final issuance

II. Operational Restrictions

1. The maximum annual isopropyl alcohol usage rate shall not exceed 400 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of isopropyl alcohol, in the first twelve months does not need to be established.
2. The maximum annual mold cleaner usage rate shall not exceed 131 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of mold cleaner, in the first twelve months does not need to be established.
3. The maximum annual primer usage rate shall not exceed 96 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of primer, in the first twelve months does not need to be established.
4. The OC content of the isopropyl alcohol shall not exceed 6.59 pounds of OC per gallon.
5. The OC content of the mold cleaner shall not exceed 5.7 pounds of OC per gallon.
6. The OC content of the primer shall not exceed 6.42 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 the injection mold operation:
 - c. The company identification for each coating and cleanup material employed.
 - d. The number of gallons for each coating and cleanup material employed.
 - e. The OC content for each coating and cleanup material employed, in pounds per gallon.
 - f. The total OC emission rate for all the coatings and cleanup materials employed, in pounds [summation of (b x c) for all coatings + summation of (b x c) for all cleanup materials].
2. The permittee shall collect and record the following information each month for the injection mold operation:
 - a. The rolling, 12-month summation of the monthly isopropyl alcohol usage, in gallons.

- b. The rolling, 12-month summation of the monthly mold cleaner usage, in gallons.
- c. The rolling, 12-month summation of the monthly primer usage, in gallons.
- d. The rolling, 12-month summation of the monthly OC mass emissions rate. i.e., $(1.c \times 2.a) + (1.c \times 2.b) + (1.c \times 2.c)$ divided by 2000 lbs/ton.

Issued: To be entered upon final issuance**IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the OC emission rate from the coatings and cleanup materials exceeded 40 pounds per day, and the actual daily OC emission rate for each such day.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12 month isopropyl alcohol, mold cleaner and primer usage limitations, in gallons and the actual rolling, 12-month usage summation, in gallons, for each such month.
3. The permittee shall notify the Director (RAPCA) in writing of any monthly record showing the use of noncomplying isopropyl, mold cleaner and primer, i.e., for VOC content. 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 30 days following the end of the calendar month.
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12 month OC emissions limitation, and the actual rolling, 12-month OC emissions for each such month.
5. The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.
6. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emissions limitations in section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation -
1.66 lbs OC/hr, including cleanup

Applicable Compliance Method -
Compliance with the hourly allowable OC emission limitation may be determined as follows:

Issued: To be entered upon final issuance

- i. multiply the maximum OC content of all the coatings (lbs/gallon) by the maximum coatings usage rate (gallons/hr);
- ii. multiply the maximum OC content of all the cleanup materials (lbs/gallon) by the maximum cleanup materials usage rate (gallons/hr); and
- iii. add i and ii.

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation based upon the results of emission tests conducted in accordance with Methods 1 - 4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- b. Emission Limitation-
40 lbs OC/day, including cleanup

Applicable Compliance Method-
Compliance with the daily allowable OC emission limitation above shall be based upon the record keeping requirements contained in Section A.III.1.d of this permit.

- c. Emission Limitation-
2.0 tons OC/yr, including cleanup as a rolling 12-month summation

Applicable Compliance Method-
Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements contained in Section A.III.2.d of this permit.

- d. Emission Limitation-
6.59 lbs OC/gallon of Isopropyl alcohol

5.7 lbs OC/gallon of Mold Cleaner

6.42 lbs OC/gallon of primer

Applicable Compliance Method-
Compliance shall be based upon the record keeping requirements specified in Section III.1.c. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

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>
P049 - Injection Mold 1100	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions units P034 thru P050 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene

TLV (mg/m3): 188.4 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 4.86 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,856 ug/m3

MAGLC (ug/m3): 4486 ug/m3

Issued: To be entered upon final issuance

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.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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PTI Application: 08 04672
Issued

Facility ID: 0857011823

Emissions Unit ID: P049

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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PTI A

Emissions Unit ID: P050

Issued: To be entered upon final issuance

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>
P050 - Injection Mold 1750	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
	OAC rule 3745-21-07(G)(2)	The organic compound (OC) emissions from this emissions unit shall not exceed 1.66 lbs/hr and 40 lbs/day including cleanup.
	OAC rule 3745-31-05(C) (Synthetic minor to avoid non-attainment provisions)	The emission limitations specified by this rule are less stringent than or as stringent as the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
		The VOC emission rate from this emissions unit shall not exceed 2.0 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions.

2. Additional Terms and Conditions

- 2.a The 1.66 lbs/hr OC emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.

Issued: To be entered upon final issuance**II. Operational Restrictions**

1. The maximum annual isopropyl alcohol usage rate shall not exceed 400 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of isopropyl alcohol, in the first twelve months does not need to be established.
2. The maximum annual mold cleaner usage rate shall not exceed 131 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of mold cleaner, in the first twelve months does not need to be established.
3. The maximum annual primer usage rate shall not exceed 96 gallons based on a rolling, 12-month summation of the usage rates. Since this is an existing source, there are existing records and therefore the usage of primer, in the first twelve months does not need to be established.
4. The OC content of the isopropyl alcohol shall not exceed 6.59 pounds of OC per gallon.
5. The OC content of the mold cleaner shall not exceed 5.7 pounds of OC per gallon.
6. The OC content of the primer shall not exceed 6.42 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 the injection mold operation:
 - c. The company identification for each coating and cleanup material employed.
 - d. The number of gallons for each coating and cleanup material employed.
 - e. The OC content for each coating and cleanup material employed, in pounds per gallon.
 - f. The total OC emission rate for all the coatings and cleanup materials employed, in pounds [summation of (b x c) for all coatings + summation of (b x c) for all cleanup materials].
2. The permittee shall collect and record the following information each month for the injection mold operation:
 - a. The rolling, 12-month summation of the monthly isopropyl alcohol usage, in gallons.

- b. The rolling, 12-month summation of the monthly mold cleaner usage, in gallons.
- c. The rolling, 12-month summation of the monthly primer usage, in gallons.
- d. The rolling, 12-month summation of the monthly OC mass emissions rate. i.e., $(1.c \times 2.a) + (1.c \times 2.b) + (1.c \times 2.c)$ divided by 2000 lbs/ton.

Issued: To be entered upon final issuance**IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the OC emission rate from the coatings and cleanup materials exceeded 40 pounds per day, and the actual daily OC emission rate for each such day.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12 month isopropyl alcohol, mold cleaner and primer usage limitations, in gallons and the actual rolling, 12-month usage summation, in gallons, for each such month.
3. The permittee shall notify the Director (RAPCA) in writing of any monthly record showing the use of noncomplying isopropyl, mold cleaner and primer, i.e., for VOC content. 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 30 days following the end of the calendar month.
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12 month OC emissions limitation, and the actual rolling, 12-month OC emissions for each such month.
5. The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.
6. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emissions limitations in section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation -
1.66 lbs OC/hr, including cleanup

Applicable Compliance Method -
Compliance with the hourly allowable OC emission limitation may be determined as follows:

Issued: To be entered upon final issuance

- i. multiply the maximum OC content of all the coatings (lbs/gallon) by the maximum coatings usage rate (gallons/hr);
- ii. multiply the maximum OC content of all the cleanup materials (lbs/gallon) by the maximum cleanup materials usage rate (gallons/hr); and
- iii. add i and ii.

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation based upon the results of emission tests conducted in accordance with Methods 1 - 4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- b. Emission Limitation-
40 lbs OC/day, including cleanup

Applicable Compliance Method-
Compliance with the daily allowable OC emission limitation above shall be based upon the record keeping requirements contained in Section A.III.1.d of this permit.

- c. Emission Limitation-
2.0 tons OC/yr, including cleanup as a rolling 12-month summation

Applicable Compliance Method-
Compliance with the annual allowable OC emission limitation shall be based upon the record keeping requirements contained in Section A.III.2.d of this permit.

- d. Emission Limitation-
6.59 lbs OC/gallon of Isopropyl alcohol

5.7 lbs OC/gallon of Mold Cleaner

6.42 lbs OC/gallon of primer

Applicable Compliance Method-
Compliance shall be based upon the record keeping requirements specified in Section III.1.c. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

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>
P050 - Injection Mold 1750	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions units P034 thru P050 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene

TLV (mg/m3): 188.4 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 4.86 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,856 ug/m3

MAGLC (ug/m3): 4486 ug/m3

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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.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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Emissions Unit ID: P053

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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>
P053 - TPO Line 2 Metal Adhesive	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(i) and OAC rule 3745-31-05(C).
		The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 2.21 lbs/hr and 53.12 lbs/day (excluding cleanup).
	OAC rule 3745-21-09(U)(2)(e)(i)	See Section A.II.1.
	OAC rule 3745-31-05(C) (Synthetic minor to avoid non-attainment provisions)	The VOC emission rate from this emissions unit shall not exceed 4.0 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions.

2. Additional Terms and Conditions

- 2.a The 2.21 lbs/hr VOC emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.

II. Operational Restrictions

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1. The maximum daily coatings usage for this emissions unit shall not exceed 8 gallons.
2. The maximum annual coating usage rate for this emissions unit not exceed 1128 gallons based on a rolling, 12-month summation of the coating usage rates.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

<u>Month</u>	<u>Maximum Allowable Cumulative Coating Usage</u>
1	94
1-2	188
1-3	282
1-4	376
1-5	470
1-6	564
1-7	658
1-8	752
1-9	846
1-10	940
1-11	1034
1-12	1128

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the coating usage rates.

3. The maximum annual cleanup material usage rate for this emissions unit not exceed 71 gallons based on a rolling, 12-month summation of the coating usage rates.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the cleanup material usage levels specified in the following table:

<u>Month</u>	<u>Maximum Allowable Cumulative Coating Usage</u>
1	5.916
1-2	11.832

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1-3	17.748
1-4	23.664
1-5	29.58
1-6	35.496
1-7	41.412
1-8	47.328
1-9	53.244
1-10	59.16
1-11	65.076
1-12	71.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the coating usage rates.

4. The VOC content for each coating employed, as applied, shall not exceed 6.64 pounds of VOC per gallon.
5. The VOC content for each cleanup material employed, shall not exceed 7.28 pounds of VOC per gallon.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the coating operation:
 - a. The company identification for each coating employed.
 - b. The volume, in gallons, for each coating employed.
 - c. The total volume, in gallons, for all the coatings employed.
 - d. The VOC content for each coating employed, as applied, in pounds per gallon.
 - e. The total VOC emission rate for all the coatings employed, in pounds [summation of (b x d) for all coatings].
2. The permittee shall maintain monthly records of the following information:
 - a. The coating usage rate for each month.

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- b. The cleanup material usage rate for each month.
- c. The VOC content for each cleanup material employed, in pounds per gallon.
- d. Beginning after the first 12 calendar months of operation following the issuance of this permit the rolling, 12-month summation of the coating usage rates.
- e. Beginning after the first 12 calendar months of operation following the issuance of this permit the rolling, 12-month summation of the cleanup material usage rates.
- f. Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative coating usage rate and the cumulative cleanup material usage for each calendar month.
- g. The rolling, 12-month summation of the monthly VOC mass emissions rate. i.e., [summation of (1.d x 2.d) for all coatings + summation of (2.c x 2.e) for all cleanup materials] divided by 2000 lbs/ton.

IV. Reporting Requirements

- 1. The permittee shall notify the Director (RAPCA) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage restriction of 8 gallons. The notification shall include a copy of such record and shall be sent to the Director (RAPCA) within 45 days after the exceedance occurs.
- 2. The permittee shall notify the Director (RAPCA) in writing of any monthly record showing the use of noncomplying coating and cleanup material, i.e., for VOC content. 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 30 days following the end of the calendar month.
- 3. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the VOC emission rate from the coatings exceeded 53.12 pounds, and the actual VOC emission rate for each such day.
- 4. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month coating usage rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels.
- 5. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month cleanup material usage rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative cleanup material usage levels.

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6. The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.
7. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

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

- a. Emission Limitation-
2.21 lbs VOC/hr, excluding cleanup

Applicable Compliance Method-

Compliance with the hourly allowable VOC emission limitation may be determined by multiply the maximum VOC content of all the coatings employed (lbs/gallon) by the maximum coatings usage rate (gallons/hr).

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation based upon the results of emission tests conducted in accordance with Methods 1 - 4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- b. Emission Limitation-
53.12 lbs VOC/day, excluding cleanup

Applicable Compliance Method-

Compliance with the daily allowable VOC emission limitation above shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

- c. Emission Limitation-
less than or equal to 8 gallons/day of coating usage

Applicable Compliance Method-

Compliance with the daily allowable coating usage restriction above shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

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- d. Emission Limitation-
4.0 tons VOC/yr, including cleanup as a rolling 12-month summation
- Applicable Compliance Method-
Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in Section A.III.2.g. of this permit.
- e. Emission Limitation-
6.64 lbs VOC/gallon of coating
- 7.28 lbs VOC/gallon of cleanup material
- Applicable Compliance Method-
Compliance shall be based upon the record keeping requirements specified in Section III.1.d for all coating and Section III 2.c for all cleanup material. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings and cleanup materials.

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VI. Miscellaneous Requirements

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None

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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>
P053 - TPO Line 2 Metal Adhesive	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or

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modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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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>
P054 - TPO lime 3 Metal Adhesive	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(i) and OAC rule 3745-31-05(C).
	OAC rule 3745-21-09(U)(2)(e)(i)	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 2.21 lbs/hr and 53.12 lbs/day (excluding cleanup).
	OAC rule 3745-31-05(C) (Synthetic minor to avoid non-attainment provisions)	See Section A.II.1.
		The VOC emission rate from this emissions unit shall not exceed 4.0 tons/yr, based upon a rolling, 12-month summation of the monthly VOC emissions.

2. Additional Terms and Conditions

- 2.a The 2.21 lbs/hr VOC emission limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, or reporting requirements to ensure compliance with this emission limitation.

II. Operational Restrictions

1. The maximum daily coatings usage for this emissions unit shall not exceed 8 gallons.
2. The maximum annual coating usage rate for this emissions unit not exceed 1128 gallons based on a rolling, 12-month summation of the coating usage rates.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

<u>Month</u>	<u>Maximum Allowable Cumulative Coating Usage</u>
1	94
1-2	188
1-3	282
1-4	376
1-5	470
1-6	564
1-7	658
1-8	752
1-9	846
1-10	940
1-11	1034
1-12	1128

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the coating usage rates.

3. The maximum annual cleanup material usage rate for this emissions unit not exceed 71 gallons based on a rolling, 12-month summation of the coating usage rates.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the cleanup material usage levels specified in the following table:

<u>Month</u>	<u>Maximum Allowable Cumulative Coating Usage</u>
1	5.916
1-2	11.832
1-3	17.748
1-4	23.664
1-5	29.58

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1-6	35.496
1-7	41.412
1-8	47.328
1-9	53.244
1-10	59.16
1-11	65.076
1-12	71.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the coating usage rates.

4. The VOC content for each coating employed, as applied, shall not exceed 6.64 pounds of VOC per gallon.
5. The VOC content for each cleanup material employed, shall not exceed 7.28 pounds of VOC per gallon.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the coating operation:
 - a. The company identification for each coating employed.
 - b. The volume, in gallons, for each coating employed.
 - c. The total volume, in gallons, for all the coatings employed.
 - d. The VOC content for each coating employed, as applied, in pounds per gallon.
 - e. The total VOC emission rate for all the coatings employed, in pounds [summation of (b x d) for all coatings].
2. The permittee shall maintain monthly records of the following information:
 - a. The coating usage rate for each month.
 - b. The cleanup material usage rate for each month.
 - c. The VOC content for each cleanup material employed, in pounds per gallon.

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- d. Beginning after the first 12 calendar months of operation following the issuance of this permit the rolling, 12-month summation of the coating usage rates.
- e. Beginning after the first 12 calendar months of operation following the issuance of this permit the rolling, 12-month summation of the cleanup material usage rates.
- f. Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative coating usage rate and the cumulative cleanup material usage for each calendar month.
- g. The rolling, 12-month summation of the monthly VOC mass emissions rate. i.e., [summation of (1.d x 2.d) for all coatings + summation of (2.c x 2.e) for all cleanup materials] divided by 2000 lbs/ton.

IV. Reporting Requirements

1. The permittee shall notify the Director (RAPCA) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage restriction of 8 gallons. The notification shall include a copy of such record and shall be sent to the Director (RAPCA) within 45 days after the exceedance occurs.
2. The permittee shall notify the Director (RAPCA) in writing of any monthly record showing the use of noncomplying coating and cleanup material, i.e., for VOC content. 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 30 days following the end of the calendar month.
3. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the VOC emission rate from the coatings exceeded 53.12 pounds, and the actual VOC emission rate for each such day.
4. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month coating usage rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels.
5. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month cleanup material usage rate limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative cleanup material usage levels.

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6. The quarterly deviation (excursion) reports shall be submitted to the Director (RAPCA) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.
7. The permittee shall submit annual reports that specify the total actual annual OC emission from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emissions limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation-
2.21 lbs VOC/hr, excluding cleanup

Applicable Compliance Method-
Compliance with the hourly allowable VOC emission limitation may be determined by multiply the maximum VOC content of all the coatings employed (lbs/gallon) by the maximum coatings usage rate (gallons/hr).

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation based upon the results of emission tests conducted in accordance with Methods 1 - 4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.
 - b. Emission Limitation-
53.12 lbs VOC/day, excluding cleanup

Applicable Compliance Method-
Compliance with the daily allowable VOC emission limitation above shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.
 - c. Emission Limitation-
less than or equal to 8 gallons/day of coating usage

Applicable Compliance Method-
Compliance with the daily allowable coating usage restriction above shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.
 - d. Emission Limitation-
4.0 tons VOC/yr, including cleanup as a rolling 12-month summation

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Applicable Compliance Method-

Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in Section A.III.2.g. of this permit.

- e. **Emission Limitation-**
6.64 lbs VOC/gallon of coating

7.28 lbs VOC/gallon of cleanup material

Applicable Compliance Method-

Compliance shall be based upon the record keeping requirements specified in Section III.1.d for all coating and Section III 2.c for all cleanup material. Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings and cleanup materials.

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VI. Miscellaneous Requirements

Emissions Unit ID: P054

None

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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>
P054 - TPO lime 3 Metal Adhesive	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or

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modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.