



State of Ohio Environmental Protection Agency

Street Address:

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P.O. Box 1049
Columbus, OH 43216-1049

**RE: DRAFT PERMIT TO INSTALL
SANDUSKY COUNTY
Application No: 03-13230**

CERTIFIED MAIL

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

DATE: 8/31/2000

Aeroquip INOAC
Glen Young
1410 Motor Dr
Fremont, OH 43420

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 **\$1200** 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.

Very truly yours,

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

CC: USEPA
Toledo Metro Area Coun of Govt

NWDO

MI



**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 03-13230

Application Number: 03-13230

APS Premise Number: 0372030199

Permit Fee: **To be entered upon final issuance**

Name of Facility: Aeroquip INOAC

Person to Contact: Glen Young

Address: 1410 Motor Dr
Fremont, OH 43420

Location of proposed air contaminant source(s) [emissions unit(s)]:

**1410 Motor Dr
Fremont, Ohio**

Description of proposed emissions unit(s):

Chapter 31 Modification to primer spray booth, color spray booth, clearcoat spray booth, primer drying oven, clearcoat drying oven.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

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

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.11 below if no deviations occurred during the quarter.

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

2. Scheduled Maintenance/Malfunction Reporting

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

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

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

4. Title IV Provisions

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

5. Severability Clause

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

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of

the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

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

7. Fees

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

8. Federal and State Enforceability

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

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

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

10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

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

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

3. Permit Transfers

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

4. 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.

5. Termination of Permit To Install

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

6. Construction of New Sources(s)

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

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

7. 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.

8. Applicability

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

9. 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.

10. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

11. 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>	<u>Net Emissions</u>
VOC	*283.00	39.0 TPY
OC	**308.00	
PM	3.99	

* This modification involves a net emissions increase of 39.00 tons, VOC per year, as defined in 40 CFR Part 52.21 (b).

** OC emissions are inclusive of VOC emissions.

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>
Primer Paint Booth (Paint Line #4)	OAC rule 3745-21-07 (G)(2)	Exempt (See A.II.1.)
	OAC rule 3745-31-05 (A)(3)	59.06 lbs VOC/hr & 283.00 tons VOC/yr
		0.46 lbs PE/hr & 2.02 tons PE/yr
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07 (A)(1)
		(See A.2.b.)
	OAC rule 3745-17-11(B)	20% opacity as a six-minute average.
	OAC rule 3745-17-07 (A)	
	OAC rule 3745-31-05 (D) Synthetic Minor to avoid PSD applicability.	Group Limit- 283.00 tons VOC/rolling 365 day period. (See A.I.2.a.)

2. Additional Terms and Conditions

- 2.a Combined annual VOC emissions from coating and cleanup operations from emissions units R006, R007, R008, P801, P004, and P005 shall not exceed 283.00 tons per year, based on a rolling, 365-day summation of the daily input rates.

Emission Units R006, R007, R008, P801, P004, and P005 are existing emission units and, as such, have existing 365-day summation of the daily input rates in lieu of establishing monthly cumulative input rates for the first year of operation.

- 2.b** The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).

II. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01 (C)(5), in this emissions unit is prohibited.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
- a. The company identification for each coating/cleanup material employed in this emissions unit; and,
 - b. Documentation on whether or not each coating/cleanup material employed is a photochemically reactive material.
2. The permittee shall collect and record the following information regarding VOC emissions each day for emissions units R006, R007, R008, P801, P004, and P005, as a group:
- a. The company identification for each coating and cleanup material employed;
 - b. The VOC content of each coating and cleanup material, employed in pounds per gallon;
 - c. The number of gallons of each coating and cleanup material employed;
 - d. The VOC emissions rate for each coating and cleanup material in pounds per day;

The company may calculate VOC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal

VOC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material)-(total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material]) x solvent density.

- e. The total VOC emissions for all coatings and cleanup materials (summation of d), in pounds per day,* and
- f. The total combined annual emissions of VOC, (tons) based upon a rolling 365-day summation of the daily VOC emission rates.*

* For purposes of calculating the VOC emissions rates for coating operations and associated drying ovens, the permittee shall utilize the following:

For coating emissions unit R006 and associated drying oven P004, the permittee shall utilize a value of 67% as the maximum percentage of the VOCs employed in the coating operation that are emitted uncontrolled from emissions unit R006. The remaining 33% of the VOCs employed in the coating operation shall be considered as emissions which are controlled to an overall efficiency of 85% by a thermal oxidizer controlling drying oven P004.

For coating emission units R007 & R008 and associated drying oven P005, the permittee shall utilize a value of 95% as the maximum percentage of VOCs employed in the coating operation emitted uncontrolled from emission unit R007 & R008. The remaining 5% of VOC's employed in the coating operation shall be considered as emissions which are controlled to an overall efficiency of 85% by a thermal oxidizer controlling drying oven P005.

The "split" of VOC emissions between coating and drying operations addressed above is based upon the results of emission testing performed May & June 1994. The permittee shall utilize "split" values of VOC emissions as determined by testing requirements contained in this permit.

Note: the coating/cleanup information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports in accordance with the general terms and conditions, which identify any deviation of the following:
 - a. The total combined annual VOC emissions from emissions units R006, R007, R008, P801, P004, and P005 per rolling 365 day period; and
2. The permittee shall submit deviation (excursion) reports in accordance with the general terms and conditions, which identify each day during which a photochemically reactive material was employed.

V. Testing Requirements

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

Applicable Compliance Method

The hourly VOC emission limitation is based on the emission unit's potential to emit*. Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

- * The potential to emit for this emissions unit was based on a maximum VOC content of 5.97 lbs per gallon and a maximum hourly usage rate of 14.76 gallons per hour. A 67%/33% split between the paint booth and the Primer Oven (P004), is applied with 67% of the emissions emitted from the paint booth (See A.III.2.d)

- b. Emission Limitation
283.00 tons VOC/rolling 365-day period, (Group limit from emissions units R006, R007, R008, P801, P004, and P005)

Applicable Compliance Method

Compliance shall be based on the record keeping requirements as specified in section A.III.

- c. Emission Limitation
0.46 lbs PE/hr, 2.02 TPY*

Applicable Compliance Method

To determine the actual worst case particulate rate (E), the following equation shall be used for the paint spraying operations:

$E =$ particulate matter emissions rate (lbs/hr)

$E =$ maximum coating solids usage rate in pounds per hour X (1-TE) X (1-CE)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used.

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance in accordance with 40 CFR Part 60, Appendix A-Method 5.

* The tons/yr emission limitation was developed by multiplying the pound /hr limitation by the maximum operating schedule of 8,760 hours/yr and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly limitations, compliance will also be shown with the annual limitation.

- d. Emission Limitation
20% opacity as a six-minute average

Applicable Compliance Method

OAC rule 3745-17-03 (B)(1)

VI. Miscellaneous Requirements

NONE

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Primer Paint Booth (Paint Line 4)		NONE (See B. I. III)

2. Additional Terms and Conditions

2.a NONE

II. Operational Restrictions

NONE

III. Monitoring and/or Recordkeeping Requirements

The permit to install for these emissions units (R006, R007, R008, P004, P005, and P801) 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” (“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: Benzene*

TLV (ug/m³): 32,000

Maximum Hourly Emission Rate (lbs/hr): 15.60

Predicted 1-hour maximum Ground-Level Concentration (ug/m³): 248

Maximum Acceptable Ground-Level Concentration (MAGLC) ($\mu\text{g}/\text{m}^3$) : 762

* The following additional conservative assumptions were made in the Screen modeling:

For the following emission units: R006, R007, R008, P004, P005, P801 all emissions of toxic compounds in the coatings or cleanup materials were assumed to be Benzene which has the lowest TLV of the remaining toxic compounds.

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a “modification” as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a “modification”:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an “allowable” emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials that would result in the emission of an air contaminant not previously permitted; and
- d. 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.

The Ohio EPA will not consider any of the above-mentioned as a “modification” requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a “modification” under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a “modification” as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

IV. Reporting Requirements

NONE

Aeroquip INOAC

PTI Application: 03-13230

Issued: To be entered upon final issuance

Facility ID: 0372030199

Emissions Unit ID: R006

V. Testing Requirements

NONE

VI. Miscellaneous Requirements

NONE

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

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>
Color Spray Booth (Paint Line #4)	OAC rule 3745-21-07 (G)(2)	Exempt (See A.II.1)
	OAC rule 3745-31-05 (A)(3)	83.75 lbs VOC/hr, 283.00 TPY 0.21 lbs PE/hr & 0.92 tons PE/yr
	OAC rule 3745-17-11(B)	The Requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1) (See A.2.b.)
	OAC rule 3745-17-07 (A)	20% opacity as a six-minute average.
	OAC rule 3745-31-05 (D) Synthetic Minor to avoid PSD applicability.	Group Limit- 283.00 tons VOC/rolling 365-day period, (see A.I.2.a.)

2. Additional Terms and Conditions

- 2.a Combined annual VOC emissions from coating and cleanup operations from emissions units R006, R007, R008, P801, P004, and P005 shall not exceed 283.00 tons per year, based on a rolling, 365-day summation of the daily input rates.

Emission Units R006, R007, R008, P801, P004, and P005 are existing emission units and, as such, have existing 365-day summation of the daily input rates in lieu of establishing monthly cumulative input rates for the first year of operation.

- 2.b The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).

II. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01 (C)(5), in this emissions unit is prohibited.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. The company identification for each coating/cleanup material employed in this emissions unit; and,
 - b. Documentation on whether or not each coating/cleanup material employed is a photochemically reactive material.
2. The permittee shall collect and record the following information regarding VOC emissions each day for emissions units R006, R007, R008, P801, P004, and P005, as a group:
 - a. The company identification for each coating and cleanup material employed;
 - b. The VOC content of each coating and cleanup material employed, in pounds per gallon;
 - c. The number of gallons of each coating and cleanup material employed;
 - d. The VOC emissions rate for each coating and cleanup material in pounds per day;

The company may calculate VOC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal

VOC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material)-(total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material]) x solvent density.

- e. The total VOC emissions rate for all coatings and cleanup materials (summation of d), in pounds per day;*
- f. The total combined annual emissions of VOC (tons), based upon a rolling 365-day summation of the daily VOC emissions rates;* and

* For purposes of calculating the VOC emissions rates for coating operations and associated drying ovens, the permittee shall utilize the following:

For coating emissions unit R006 and associated drying oven P004, the permittee shall utilize a value of 67% as the maximum percentage of the VOCs employed in the coating operation that are emitted uncontrolled from emissions unit R006. The remaining 33% of the VOCs employed in the coating operation shall be considered as emissions which are controlled to an overall efficiency of 85% by a thermal oxidizer controlling drying oven P004.

For coating emission units R007 & R008 and associated drying oven P005, the permittee shall utilize a value of 95% as the maximum percentage of VOCs employed in the coating operation emitted uncontrolled from emission unit R007 & R008. The remaining 5% of VOC's employed in the coating operation shall be considered as emissions which are controlled to an overall efficiency of 85% by a thermal oxidizer controlling drying oven P005.

The "split" of VOC emissions between coating and drying operations addressed above is based upon the results of emission testing performed May & June 1994. The permittee shall utilize "split" values of VOC emissions as determined by testing requirements contained in this permit.

Note: the coating/cleanup information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports in accordance with the general terms and conditions, which identify any deviation of the following:
 - a. The total combined annual VOC emissions from emissions units R006, R007, R008, P801, P004, and P005 per rolling 365-day period; and
2. The permittee shall submit deviation (excursion) reports in accordance with the general terms and conditions, which identify each day during which a photochemically reactive material was employed.

V. Testing Requirements

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

- a. Emission Limitation
83.75 lbs VOC/hr

Applicable Compliance Method

The hourly VOC emission limitation is based on the emission unit's potential to emit

- * Therefore, no hourly record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.
- * The potential to emit for this emissions unit was based on a maximum VOC content of 5.7 pounds per gallon and a maximum hourly usage rate of 14.76 gallons per hour. A 95%/5% split between the paint booth and the Primer Oven (P005), is applied with 95% of the emissions emitted from the paint booth (See A.III.2.d)

- b. Emission Limitation
283.00 tons VOC/rolling 365-day period (Group limit from emissions units R006, R007, R008, P801, P004, and P005)

Applicable Compliance Method

Compliance shall be based on the record keeping requirements as specified in section A.III.

- c. Emission Limitation
0.21 lbs PE/hr, 0.92 TPY*

Applicable Compliance Method

To determine the actual worst case particulate rate (E), the following equation shall be used for the paint spraying operations:

$$E = \text{particulate matter emissions rate (lbs/hr)}$$

$$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$$

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used.

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to OAC rule 3745-17-03 (B)(10).

* The tons/yr emission limitation was developed by multiplying the pound /hr limitation by the maximum operating schedule of 8,760 hours/yr and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly limitations, compliance will also be shown with the annual limitation.

- d. Emission Limitation
20% opacity as a six-minute average

Applicable Compliance Method

OAC rule 3745-17-03(B)(1)

VI. Miscellaneous Requirements

NONE

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Color Spray Booth (Paint Line #4)		NONE (See B. I. III)

2. Additional Terms and Conditions

2.a NONE

II. Operational Restrictions

NONE

III. Monitoring and/or Recordkeeping Requirements

The permit to install for these emissions units (R006, R007, R008, P004, P005, and P801) 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” (“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: Benzene*

TLV (ug/m³): 32,000

Maximum Hourly Emission Rate (lbs/hr): 15.60

Predicted 1-hour maximum Ground-Level Concentration (ug/m³): 248

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 762

* The following additional conservative assumptions were made in the Screen modeling:

For the following emission units: R006, R007, R008, P004, P005, P801 all emissions of toxic compounds in the coatings or cleanup materials were assumed to be Benzene which has the lowest TLV of the remaining toxic compounds.

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a “modification” as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a “modification”:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an “allowable” emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials that would result in the emission of an air contaminant not previously permitted; and
- d. 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.

The Ohio EPA will not consider any of the above-mentioned as a “modification” requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a “modification” under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a “modification” as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

IV. Reporting Requirements

NONE

Aeroquip INOAC

PTI Application: 03-13230

Issued: To be entered upon final issuance

Facility ID: 0372030199

Emissions Unit ID: R007

V. Testing Requirements

NONE

VI. Miscellaneous Requirements

NONE

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

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>
Clearcoat Spray Booth (Paint Line #4)	OAC rule 3745-21-07 (G)(2)	Exempt (See A.II.1.)
	OAC rule 3745-31-05 (A)(3)	55.76 lbs VOC/hr & 283.00 tons VOC/yr 0.24 lbs PE/hr & 1.05 tons PE/yr The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07 (A)(1)
		(See A.2.b.)
	OAC rule 3745-17-11(B)	20% opacity as a six-minute average.
	OAC rule 3745-17-07 (A)	
	OAC rule 3745-31-05 (D) Synthetic Minor to avoid PSD applicability	Group Limit-283.00 tons VOC/rolling 365-day period, (See A.I.2.a.)

2. Additional Terms and Conditions

- 2.a Combined annual VOC emissions from coating and cleanup operations emissions units R006, R007, R008, P801, P004, and P005 shall not exceed 283.00 tons per year, based on a rolling, 365-day summation of the monthly input rates.

Emission Units R006, R007, R008, P801, P004, and P005 are existing emission units and, as such, have existing 365-day summation of the daily input rates in lieu of establishing monthly cumulative input rates for the first year of operation.

- 2.b The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).

II. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01 (C)(5), in this emissions unit is prohibited.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. The company identification for each coating/cleanup material employed in this emissions unit; and,
 - b. Documentation on whether or not each coating/cleanup material employed is a photochemically reactive material.
2. The permittee shall collect and record the following information regarding VOC emissions each day for emissions units R006, R007, R008, P801, P004, and P005, as a group:
 - a. The company identification for each coating and cleanup material employed;
 - b. The VOC content of each coating and cleanup material, employed in pounds per gallon;
 - c. The number of gallons of each coating and cleanup material employed;
 - d. The VOC emissions rate for each coating and cleanup material in pounds per day;

The company may calculate VOC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal

VOC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material)-(total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material]) x solvent density.

- e. The total VOC emissions rate for all coatings and cleanup materials (summation of d), in pounds per month;* and
- f. The total combined annual emissions of VOC (tons), based upon a rolling 365-day summation of the daily VOC emission rates*.

* For purposes of calculating the VOC emissions rates for coating operations and associated drying ovens, the permittee shall utilize the following:

For coating emissions unit R006 and associated drying oven P004, the permittee shall utilize a value of 67% as the maximum percentage of the VOCs employed in the coating operation that are emitted uncontrolled from emissions unit R006. The remaining 33% of the VOCs employed in the coating operation shall be considered as emissions which are controlled to an overall efficiency of 85% by a thermal oxidizer controlling drying oven P004.

For coating emission units R007 & R008 and associated drying oven P005, the permittee shall utilize a value of 95% as the maximum percentage of VOCs employed in the coating operation emitted uncontrolled from emission unit R007 & R008. The remaining 5% of VOC's employed in the coating operation shall be considered as emissions which are controlled to an overall efficiency of 85% by a thermal oxidizer controlling drying oven P005.

The "split" of VOC emissions between coating and drying operations addressed above is based upon the results of emission testing performed May & June 1994. The permittee shall utilize "split" values of VOC emissions as determined by testing requirements contained in this permit.

Note: the coating/cleanup information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports in accordance with the general terms and conditions, which identify any deviation of the following:
 - a. The total combined annual VOC emissions from emissions units R006, R007, R008, P801, P004, and P005 per rolling 365-day period; and
2. The permittee shall submit deviation (excursion) reports in accordance with the general terms and conditions, which identify each day during which a photochemically reactive material was employed.

V. Testing Requirements

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

Applicable Compliance Method
The hourly VOC emission limitation is based on the emission unit's potential to emit*. Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

* The potential to emit for this emissions unit was based on a maximum VOC content of 4.41 lbs per gallon and a maximum hourly usage rate of 13.30 gallons per hour. A 95%/ 5% split between the paint booth and the Primer Oven (P005), is applied with 95% of the emissions emitted from the paint booth. (See A.III.2.d.)
 - b. Emission Limitation
283.00 tons VOC/365-day period (Group limit from emissions units R006, R007, R008, P801, P004, and P005)

Applicable Compliance Method

Compliance shall be based on the record keeping requirements as specified in section A.III.

- c. Emission Limitation
0.24 lbs PE/hr, 1.05 TPY*

Applicable Compliance Method

To determine the actual worst case particulate rate (E), the following equation shall be used for the paint spraying operations:

$E =$ particulate matter emissions rate (lbs/hr)

$E =$ maximum coating solids usage rate in pounds per hour X (1-TE) X (1-CE)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used.

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with the above emissions limit pursuant to OAC rule 3745-17-03 (B)(10).

* The tons/yr emission limitation was developed by multiplying the pound /hr limitation by the maximum operating schedule of 8,760 hours/yr and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly limitations, compliance will also be shown with the annual limitation.

- d. Emission Limitation
20% opacity as a six-minute average

Applicable Compliance Method

OAC rule 3745-17-03 (B)(1)

VI. Miscellaneous Requirements

NONE

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Clearcoat Spray Booth (Paint Line #4)		NONE (See B.I.III.)

2. **Additional Terms and Conditions**

- 2.a None

II. Operational Restrictions

NONE

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for these emissions units (R006, R007, R008, P004, P005, and P801) 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” (“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: Benzene*

TLV (ug/m³): 32,000

Maximum Hourly Emission Rate (lbs/hr): 15.60

Predicted 1-hour maximum Ground-Level Concentration (ug/m³): 248

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 762

*The following additional conservative assumptions were made in the Screen modeling:

For the following emission units: R006, R007, R008, P004, P005, P801 all emissions of toxic compounds in the coatings or cleanup materials were assumed to be Benzene which has the lowest TLV of the remaining toxic compounds.

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a “modification” as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a “modification”:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an “allowable” emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials that would result in the emission of an air contaminant not previously permitted; and
- d. 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.

The Ohio EPA will not consider any of the above-mentioned as a “modification” requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a “modification” under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a “modification” as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

Aeroquip INOAC

PTI Application: 03-13230

Issued: To be entered upon final issuance

Facility ID: 0372030199

Emissions Unit ID: R008

IV. Reporting Requirements

NONE

V. Testing Requirements

NONE

VI. Miscellaneous Requirements

NONE

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

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>
Primer Drying Oven with Thermal Oxidizer	OAC rule 3745-21-07 (G)(1)	Emissions of OC shall be reduced by at least eighty-five percent (85%), by weight, as an overall control efficiency.
	OAC rule 3745-31-05 (A)(3)	4.36 lbs OC/hr, & 19.09 tons/yr
	OAC rule 3745-21-07 (G)(6)	Ninety percent or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide.
	OAC rule 3745-31-05 (D) Synthetic Minor to avoid PSD applicability.	Group limit-283.00 tons VOC/rolling 365-day period, (See A.I.2.b. below)

2. Additional Terms and Conditions

- 2.a OAC rule 3745-21-07 (G)(1) limits organic compound (OC) emissions to 3 per hour and 15 pounds per day or requires an 85% reduction in OC emissions. The thermal oxidizer is employed to comply with the requirement to achieve an 85% reduction in OC emissions instead of complying with the OC emission limits of 3 pounds per hour and 15 pounds per day.
- 2.b Combined annual VOC emissions from coating and cleanup operations from emissions units R006, R007, R008, P801, P004, and P005 shall not exceed 283.00 tons VOC per year, based on a rolling, 365-day summation of the daily input rates.

Emission Units R006, R007, R008, P801, P004, and P005 are existing emission units and, as such, have existing 365-day summation of the daily input rates in lieu of establishing monthly cumulative input rates for the first year of operation.

II. Operational Restrictions

1. The average combustion temperature within a thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
2. The permittee shall operate and maintain the thermal oxidizer in accordance with the manufacture's recommendations, instructions and operating manual(s).

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the combustion temperature. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall collect and record the following information for each day:
 - a. All 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated that the emissions unit was in compliance.
 - b. A log for the capture (collection) system, control device and monitoring equipment which includes the following:
 - i. Downtime when the associated emissions unit was in operation.
 - ii. Operating time.
3. The permittee shall collect and record the following information regarding VOC emissions each month for emissions units R006, R007, R008, P801, P004, and P005, as a group:
 - a. The company identification for each coating and cleanup material employed;
 - b. The VOC content of each coating and cleanup material employed, in pounds per gallon;
 - c. The number of gallons of each coating and cleanup material employed;
 - d. The VOC emissions rate for each coating and cleanup material in pounds per day;

The company may calculate VOC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal

VOC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material)-(total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material] x solvent density.

- e. The total VOC emissions for all coatings and cleanup materials (summation of d), in pounds per day;* and
- f. The combined annual emissions of VOC, based upon a rolling 365-day summation of the daily VOC emission rates.*

*For purposes of calculating the VOC emissions rates for coating operations and associated drying ovens, the permittee shall utilize the following:

For coating emissions unit R006 and associated drying oven P004, the permittee shall utilize a value of 67% as the maximum percentage of the VOCs employed in the coating operation that are emitted uncontrolled from emissions unit R006. The remaining 33% of the VOCs employed in the coating operation shall be considered as emissions which are controlled to an overall efficiency of 85% by a thermal oxidizer controlling drying oven P004.

For coating emission units R007 & R008 and associated drying oven P005, the permittee shall utilize a value of 95% as the maximum percentage of VOCs employed in the coating operation emitted uncontrolled from emission unit R007 & R008. The remaining 5% of VOC's employed in the coating operation shall be considered as emissions which are controlled to an overall efficiency of 85% by a thermal oxidizer controlling drying oven P005.

The "split" of VOC emissions between coating and drying operations addressed above is based upon the results of emission testing performed May & June 1994. The permittee shall utilize "split" values of VOC emissions as determined by testing requirements contained in this permit.

Note: the coating/cleanup information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

IV. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports in accordance with the general terms and conditions, which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above.
- 2. The permittee shall submit quarterly summaries which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation. These summaries shall be submitted on the same time schedule as the deviation reports.
- 3. The permittee shall submit deviation excursion reports in accordance with the general terms and conditions, which identify any deviation of the following:
 - a. The total combined annual VOC emissions from emissions units R006, R007, R008, P801, P004, and P005 per rolling 356-day period; and

V. Testing Requirements

1. Test Requirements

- a. Emissions testing shall be conducted within 3 months after startup of this emissions unit.
- b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for organic compounds and the ninety percent destruction efficiency requirement for the thermal incinerator. Emission testing results shall also be used to determine “split” values of VOC emissions between coating and drying operations.
- c. The following test method(s) shall be employed to demonstrate compliance with the destruction efficiency requirement for the thermal oxidizer: Method 25 or 25A of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA. The test method and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
- d. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA’s “Guidelines for Determining Capture Efficiency,” dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.”
- e. The test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

2. Compliance Methods Requirements:

a. Emission Limitation

4.36 lbs OC/hr

Applicable Compliance Method

The hourly VOC emission limitation is based on the emission units potential to emit*. Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit for this emissions unit was based on a maximum VOC content of 5.97 lbs per gallon and a maximum hourly usage rate of 14.76 gallons per hour. A 67%/ 33% split between the coating operation R006 and the Primer Oven P004 is applied with 33% of these emissions going to the oven. The emissions from the drying oven are controlled to an overall efficiency of 85% by a thermal oxidizer (See A.III.3.d.)

b. Emission Limitation

19.09 tons VOC/yr

Applicable Compliance Method

The tons/yr emission limitation was developed by multiplying the pound /hr limitation by the maximum operating schedule of 8,760 hours/yr and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly limitations, compliance will also be shown with the annual limitation.

c. Emission Limitation

283.00 tons VOC/Rolling 365-day period, (Group limit from emissions units R006, R007, R008, P801, P004, and P005)

Applicable Compliance Method

Compliance shall be based on the record keeping requirements as specified in section A.III. 3

d. Emission Limitation: Use of control system with 85% overall control efficiency rate for OC.

Applicable Compliance Method:

Compliance with this limitation will be based on the required testing in section A.V.1.

VI. Miscellaneous Requirements

NONE

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Primer Drying Oven with Thermal Oxidizer		NONE (See B.I.III.)

2. **Additional Terms and Conditions**

- 2.a NONE

II. Operational Restrictions

NONE

III. Monitoring and/or Recordkeeping Requirements

The permit to install for these emissions units (R006, R007, R008, P004, P005, and P801) 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” (“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: Benzene*

TLV (ug/m³): 32,000

Maximum Hourly Emission Rate (lbs/hr): 15.60

Predicted 1-hour maximum Ground-Level Concentration (ug/m³): 248

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³) : 762

* The following additional conservative assumptions were made in the Screen modeling:

For the following emission units: R006, R007, R008, P004, P005, P801 all emissions of toxic compounds in the coatings or cleanup materials were assumed to be Benzene which has the lowest TLV of the remaining toxic compounds.

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a “modification” as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a “modification”:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an “allowable” emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials that would result in the emission of an air contaminant not previously permitted; and
- d. 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.

The Ohio EPA will not consider any of the above-mentioned as a “modification” requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a “modification” under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a “modification” as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

IV. Reporting Requirements

NONE

V. Testing Requirements

NONE

VI. Miscellaneous Requirements

NONE

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

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>
Clearcoat Drying Oven with Thermal Oxidizer	OAC rule 3745-21-07 (G)(1)	Emissions of OC shall be reduced by at least eighty-five percent (85%), by weight, as an overall control efficiency.
	OAC rule 3745-31-05 (A)(3)	1.10 lbs OC/hr, & 4.82 tons/yr.
	OAC rule 3745-21-07 (G)(6)	Ninety percent or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide.
	OAC rule 3745-31-05 (D) Synthetic Minor to avoid PSD applicability.	Group limit 283.00 tons VOC/rolling 365-day period, (See A.I.2.b. below)

2. Additional Terms and Conditions

- 2.a OAC rule 3745-21-07 (G)(1) limits volatile organic compound (OC) emissions to 3 per hour and 15 pounds per day or requires an 85% reduction in OC emissions. The thermal oxidizer is employed to comply with the requirement to achieve an 85% reduction in OC emissions instead of complying with the OC emission limits of 3 pounds per hour and 15 pounds per day.
- 2.b Combined annual VOC emissions from coating and cleanup operations from emissions units R006, R007, R008, P801, P004, and P005 shall not exceed 283.00 tons VOC per year, based on a rolling, 365-day summation of the daily input rates.

Emission Units R006, R007, R008, P801, P004, and P005 are existing emission units and, as such, have existing 365-day summation of the daily input rates in lieu of establishing monthly cumulative input rates for the first year of operation.

II. Operational Restrictions

1. The average combustion temperature within a thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
2. The permittee shall operate and maintain the thermal oxidizer in accordance with the manufacture's recommendations, instructions and operating manual(s).

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the combustion temperature. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
2. The permittee shall collect and record the following information for each day:
 - a. All 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated that the emissions unit was in compliance.
 - b. A log for the capture (collection) system, control device and monitoring equipment which includes the following:
 - i. Downtime when the associated emissions unit was in operation.
 - ii. Operating time.
3. The permittee shall collect and record the following information regarding VOC emissions each month for emissions units R006, R007, R008, P801, P004, and P005, as a group:
 - a. The company identification for each coating and cleanup material employed;
 - b. The VOC content of each coating and cleanup material employed, in pounds per gallon;
 - c. The number of gallons of each coating and cleanup material employed;
 - d. The VOC emissions rate for each coating and cleanup material pounds per day;

The company may calculate VOC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal

VOC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material)-(total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material] x solvent density).

- e. The total VOC emissions rate for all coatings and cleanup materials (summation of d), in pounds per day;* and
- f. The combined annual emissions of VOC, based upon a rolling 365 day summation of the daily VOC emission rates.*

*For purposes of calculating the VOC emissions rates for coating operations and associated drying ovens, the permittee shall utilize the following:

For coating emissions unit R006 and associated drying oven P004, the permittee shall utilize a value of 67% as the maximum percentage of the VOCs employed in the coating operation that are emitted uncontrolled from emissions unit R006. The remaining 33% of the VOCs employed in the coating operation shall be considered as emissions which are controlled to an overall efficiency of 85% by a thermal oxidizer controlling drying oven P004.

For coating emission units R007 & R008 and associated drying oven P005, the permittee shall utilize a value of 95% as the maximum percentage of VOCs employed in the coating operation emitted uncontrolled from emission unit R007 & R008. The remaining 5% of VOC's employed in the coating operation shall be considered as emissions which are controlled to an overall efficiency of 85% by a thermal oxidizer controlling drying oven P005.

The "split" of VOC emissions between coating and drying operations addressed above is based upon the results of emission testing performed May & June 1994. The permittee shall utilize "split" values of VOC emissions as determined by testing requirements contained in this permit.

Note: the coating/cleanup information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

IV. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports in accordance with the general terms and conditions, which identify all 3-hour blocks of time during which the average temperature within the thermal incinerator does not comply with the temperature limitation specified above
- 2. The permittee shall submit quarterly summaries which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation. These summaries shall be submitted on the same time schedule as the deviation reports.
- 3. The permittee shall submit deviation excursion reports in accordance with the general terms and conditions, which identify any deviation of the following:
 - a. The total combined annual VOC emissions from emissions units R006, R007, R008, P801, P004, and P005 per rolling 365-day period; and

V. Testing Requirements

1. Test Requirements

- a. Emissions testing shall be conducted within 3 months after startup of this emissions unit.
- b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for organic compounds and the ninety percent destruction efficiency requirement for the thermal incinerator. Emission testing results shall also be used to determine “split” values of VOC emissions between coating and drying operations.
- c. The following test method(s) shall be employed to demonstrate compliance with the destruction efficiency requirement for the thermal oxidizer: Method 25 or 25A of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA. The test method and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
- d. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA’s “Guidelines for Determining Capture Efficiency,” dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.”
- e. The test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

2. Compliance Methods Requirements:

- a. Emission Limitation
1.10 lbs OC/hr

Applicable Compliance Method

The hourly OC emission limitation is based on the emission units potential to emit*. Therefore, no hourly record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit for this emissions unit was based on a maximum OC content of 5.71 lbs per gallon and a maximum hourly usage rate of 14.76 gallons per hour, and 4.41 lbs per gallon and 13.30 gallons per hour. A %95/ 5% split between the coating operation R007, R008 and the Clearcoat Oven P005 is applied with 5% of these emissions going to the oven.

The emissions from the drying oven are controlled to an overall efficiency of 85% by a thermal oxidizer (See A.III.3.d.)

- b. Emission Limitation
4.82 tons OC/yr

Applicable Compliance Method

The tons/yr emission limitation was developed by multiplying the pound /hr limitation by the maximum operating schedule of 8,760 hours/yr and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly limitations, compliance will also be shown with the annual limitation.

- c. Emission Limitation
283.00 tons VOC/yr (Group limit from emissions units R006, R007, R008, P801, P004, and P005)

Applicable Compliance Method

Compliance shall be based on the record keeping requirements as specified in section A.III.

- d. Emission Limitation: Use of control system with 85% overall control efficiency rate for OC.

Applicable Compliance Method: Compliance with this limitation will be based on the required testing in section A.V.1.

VI. Miscellaneous Requirements

NONE

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Clearcoat Drying Oven with Thermal Oxidizer.		NONE (See B.I.III.)

2. **Additional Terms and Conditions**

- 2.a NONE

II. Operational Restrictions

NONE

III. Monitoring and/or Record keeping Requirements

The permit to install for these emissions units (R006, R007, R008, P004, P005, and P801) 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" ("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: Benzene*

TLV (ug/m³): 32,000

Maximum Hourly Emission Rate (lbs/hr): 15.60

Predicted 1-hour maximum Ground-Level Concentration (ug/m³): 248

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 762

* The following additional conservative assumptions were made in the Screen modeling:

For the following emission units: R006, R007, R008, P004, P005, P801 all emissions of toxic compounds in the coatings or cleanup materials were assumed to be Benzene which has the lowest TLV of the remaining toxic compounds.

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a “modification” as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a “modification”:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an “allowable” emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials that would result in the emission of an air contaminant not previously permitted; and
- d. 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.

The Ohio EPA will not consider any of the above-mentioned as a “modification” requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a “modification” under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a “modification” as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

IV. Reporting Requirements

NONE

V. Testing Requirements

NONE

VI. Miscellaneous Requirements

NONE

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

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>
Cleanup Operations (Paint Line #4)	OAC rule 3745-21-07 (G)(2)	None (See A.II.1.)
	OAC rule 3745-31-05 (A)(3)	10.83 tons OC/month & 130.02 tons/yr*
	OAC rule 3745-31-05 (D) Synthetic Minor to avoid PSD applicability	Group limit- 283.00 tons VOC/rolling 365-day period, (See A.I.2.a.)

2. **Additional Terms and Conditions**

- 2.a Combined annual VOC emissions from coating and cleanup operations from emissions units R006, R007, R008, P801, P004, and P005 shall not exceed 283.00 tons per year, based on a rolling, 365-day summation of the daily input rates.

Emission Units R006, R007, R008, P801, P004, and P005 are existing emission units and, as such, have existing 365-day summation of the daily input rates in lieu of establishing monthly cumulative input rates for the first year of operation.

* OC are inclusive of VOC Emissions

II. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01 (C)(5), in this emissions unit is prohibited.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. The company identification for each cleanup material employed in this emissions unit; and,

- b. Documentation on whether or not each cleanup material employed is a photochemically reactive material.
2. The permittee shall collect and record the following information regarding VOC emissions each day for emissions units R006, R007, R008, P801, P004, and P005, as a group:
 - a. The company identification for each coating and cleanup material employed;
 - b. The VOC content of each coating and cleanup material employed, in pounds per gallon;
 - c. The number of gallons of each coating and cleanup material employed;
 - d. The VOC emissions rate for each coating and cleanup material, in pounds per day;

The company may calculate VOC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal

VOC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material)-(total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material]) x solvent density.

- e. The total VOC emissions for all coating and cleanup materials (summation of d), in pounds per day; and
- f. The combined annual emissions of VOC, based upon a rolling 365-day summation of the daily VOC emission rates.

Note: the cleanup information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation excursion reports in accordance with the general terms and conditions, which identify any deviation of the following:
 - a. The total combined annual VOC emissions from emissions units R006, R007, R008, P801, P004, and P005 per rolling 365-day period; and
2. The permittee shall submit deviation (excursion) reports in accordance with the general terms and conditions, which identify each day during which a photochemically reactive material was employed.

V. Testing Requirements

1. Compliance with the emissions limitations in section A.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation
10.83 tons OC/month

Applicable Compliance Method

Compliance shall be based on record keeping requirements as specified in section B.III.

b. Emission Limitation

130.02 tons OC/yr

Applicable Compliance Method

Compliance shall be based on record keeping requirements as specified in section B.III.

c.. Emission Limitation

283.00 tons VOC/yr (Group limit from emissions units R006, R007, R008, P801, P004, and P005)

Applicable Compliance Method

Compliance shall be based on the record keeping requirements as specified in section A.III.2.

VI. Miscellaneous Requirements

NONE

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Cleanup Operations (Paint Line #4)		NONE (See B.I.III.)

2. **Additional Terms and Conditions**

- 2.a NONE

II. Operational Restrictions

NONE

III. Monitoring and/or Recordkeeping Requirements

The permit to install for these emissions units (R006, R007, R008, P004, P005, and P801) 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” (“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: Benzene*

TLV (ug/m³): 32,000

Maximum Hourly Emission Rate (lbs/hr): 15.60

Predicted 1-hour maximum Ground-Level Concentration (ug/m³): 248

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³) : 762

* The following additional conservative assumptions were made in the Screen modeling:

For the following emission units: R006, R007, R008, P004, P005, P801 all emissions of toxic compounds in the coatings or cleanup materials were assumed to be Benzene which has the lowest TLV of the remaining toxic compounds.

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a “modification” as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a “modification”:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an “allowable” emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials that would result in the emission of an air contaminant not previously permitted; and
- d. 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.

The Ohio EPA will not consider any of the above-mentioned as a “modification” requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a “modification” under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a “modification” as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

V. Testing Requirements

NONE

VI. Miscellaneous Requirements

NONE