



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

9/6/2013

**Certified Mail**

Joyce Kolakowski  
Meteor Sealing Systems LLC  
400 S. Tuscarawas Ave.  
Dover, OH 44622

Yes	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
Yes	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0679015004  
Permit Number: P0108043  
Permit Type: OAC Chapter 3745-31 Modification  
County: Tuscarawas

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of 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 permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Times-Reporter. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall Permit Review/Development Section Ohio EPA, DAPC 122 South Front Street Columbus, Ohio 43215	and	Ohio EPA DAPC, Southeast District Office 2195 Front Street Logan, OH 43138
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Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Southeast District Office at (740)385-8501.

Sincerely,

*Michael W. Ahern*  
Michael W. Ahern, Manager  
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 Via E-Mail Notification  
Ohio EPA-SEDO; Pennsylvania; West Virginia



PUBLIC NOTICE

9/6/2013 Issuance of Draft Air Pollution Permit-To-Install and Operate

Meteor Sealing Systems LLC

400 S Tuscarawas,

Dover, OH 44622

Tuscarawas County

FACILITY DESC.: Rubber Product Manufacturing for Mechanical Use

PERMIT #: P0108043

PERMIT TYPE: OAC Chapter 3745-31 Modification

PERMIT DESC: Chapter 31 modifications of EUs R001 (now K002) and R002 permitted in PTIO P0105045 issued on September 30, 2009, and EU R003 permitted in PTIO P0108529 issued 8/29/11, to incorporate requested increases in allowable emissions and federally enforceable restrictions sufficient for the facility to avoid being classified as a major stationary source subject to Title V requirements

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Kimbra Reinbold, Ohio EPA DAPC, Southeast District Office, 2195 Front Street, Logan, OH 43138. Ph: (740)385-8501





## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Meteor Sealing Systems manufactures rubber gaskets for the automotive industry at its facility located at 400 S. Tuscarawas Rd. in Dover, Ohio (Tuscarawas County). This permit covers three existing rubber gasket extrusion and coating sources: Extrusion Line #2 (EU K002) originally installed in 2002 and modified in June of 2011, Robot Booth #1 (EU R002) originally installed in 1999 and modified in June of 2011, and Robot Booth #2 (EU R003) originally installed in August of 2011 and modified in October of 2011.

3. Facility Emissions and Attainment Status:

Tuscarawas County is currently in attainment for all criteria pollutants. Because potential VOC and HAP emissions exceed major Title V source thresholds on a facility-wide basis, Meteor Sealing Systems has requested that the permit for these sources include federally enforceable restrictions on VOC and HAP emissions to ensure that Title V requirements do not apply to this plant.

4. Source Emissions:

This FEPTIO contains facility-wide restrictions on material usage sufficient to ensure that potential VOC and HAP emissions from all sources at the facility do not exceed major Title V thresholds. The company will be required to track usage of all coatings and solvents at the facility and perform calculations to demonstrate that actual emissions do not exceed 99.0 tons of VOC per rolling, 12-month period, and that individual and total HAP emissions do not exceed 9.9 and 24.9 tons per year, respectively, based on a rolling, 12-month summation.

5. Conclusion:

The operational restrictions, emissions limits, monitoring and record keeping requirements in this permit are sufficient to limit the potential to emit for this unit to below Title V major source thresholds. Compliance with the facility-wide federally enforceable limits of 99.0 tons of VOC, 9.9 tons of individual HAP, and 24.9 tons of total HAP based on rolling, 12-month summations ensures that Title V rules do not apply to Meteor Sealing System's Dover facility.

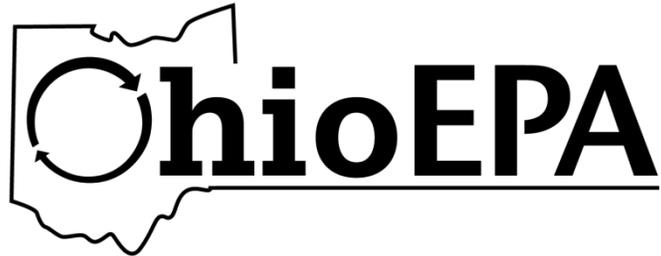
6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	99.0 (facility-wide)
PE	0.43
HAP (highest individual)	9.9 (facility-wide)
HAP (total)	24.9 (facility-wide)





**DRAFT**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
Meteor Sealing Systems LLC**

Facility ID:	0679015004
Permit Number:	P0108043
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	9/6/2013
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
Meteor Sealing Systems LLC

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**Draft Permit-to-Install and Operate**

Meteor Sealing Systems LLC

**Permit Number:** P0108043

**Facility ID:** 0679015004

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

## Authorization

Facility ID: 0679015004  
Application Number(s): A0041755, A0042010, A0043900, A0044634  
Permit Number: P0108043  
Permit Description: Chapter 31 modifications of EUs R001 (now K002) and R002 permitted in PTIO P0105045 issued on September 30, 2009, and EU R003 permitted in PTIO P0108529 issued 8/29/11, to incorporate requested increases in allowable emissions and federally enforceable restrictions sufficient for the facility to avoid being classified as a major stationary source subject to Title V requirements  
Permit Type: OAC Chapter 3745-31 Modification  
Permit Fee: \$800.00 *DO NOT send payment at this time, subject to change before final issuance*  
Issue Date: 9/6/2013  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Meteor Sealing Systems LLC  
400 S Tuscarawas  
Dover, OH 44622

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Southeast District Office  
2195 Front Street  
Logan, OH 43138  
(740)385-8501

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally  
Director



## Authorization (continued)

Permit Number: P0108043

Permit Description: Chapter 31 modifications of EUs R001 (now K002) and R002 permitted in PTIO P0105045 issued on September 30, 2009, and EU R003 permitted in PTIO P0108529 issued 8/29/11, to incorporate requested increases in allowable emissions and federally enforceable restrictions sufficient for the facility to avoid being classified as a major stationary source subject to Title V requirements

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

<b>Emissions Unit ID:</b>	<b>K002</b>
Company Equipment ID:	Extrusion Line 2
Superseded Permit Number:	P0105045
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>R002</b>
Company Equipment ID:	Robot Booth
Superseded Permit Number:	P0105045
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>R003</b>
Company Equipment ID:	Robot Booth # 2
Superseded Permit Number:	P0108529
General Permit Category and Type:	Not Applicable



**Draft Permit-to-Install and Operate**

Meteor Sealing Systems LLC

**Permit Number:** P0108043

**Facility ID:** 0679015004

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

## **A. Standard Terms and Conditions**



**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Southeast District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting<sup>1</sup> a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

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<sup>1</sup> Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



**Draft Permit-to-Install and Operate**

Meteor Sealing Systems LLC

**Permit Number:** P0108043

**Facility ID:** 0679015004

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

## **B. Facility-Wide Terms and Conditions**



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) 4.b)-e) and 5.c).
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) 2.a), 3.a), 4.a) and 5.b).

2. Applicable Emissions Limitations and/or Control Requirements

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a)	OAC rule 3745-31-05(D) (Synthetic minor restriction to avoid Title V requirements)	<p>Volatile organic compound (VOC) emissions from coatings and cleanup material use at the facility (emissions units K001-K003, R002-R006 and R009) shall not exceed 99.0 tons based on a rolling, 12-month summation.</p> <p>Emissions of any single hazardous air pollutant (HAP) from coatings and cleanup material use at the facility (emissions units K001-K003, R002-R006 and R009) shall not exceed 9.9 tons based on a rolling, 12-month summation.</p> <p>Total HAP emissions from coatings and cleanup material use at the facility (emissions units K001-K003, R002-R006 and R009) shall not exceed 24.9 tons based on a rolling, 12-month summation.</p> <p>See 3.a) below.</p>

3. Operating Restrictions

- a) The maximum total material usage for emissions units K001-K003, R002-R006 and R009, combined, shall not cause VOC emissions to exceed 99.0 tons as a rolling, 12-month summation, highest individual HAP emissions to exceed 9.9 tons as a rolling, 12-month summation and total HAP emissions to exceed 24.9 tons as a rolling, 12-month summation based on the following equations:
  - (1) n



$$X = \sum_{i=1}^n (G)(VOC)/2,000\text{lbs}$$

Where:

X= tons of VOC emissions per month;

G= monthly usage of each coating and cleanup material, in gallons;

VOC= VOC content of each coating and cleanup material, in pounds of VOC per gallon;

n = total number of coatings; and

n

$\sum_{i=1}^n (X)$  is  $\leq 99.0$  tons VOC, as a rolling 12-month summation

Where:

n = months in the rolling, 12-month period.

(2) 
$$Y = \sum_{i=1}^n (G)(HAP_{HI})/2,000\text{lbs}$$

Where:

Y= tons of highest HAP emissions per month;

G= monthly usage of each coating and cleanup material, in gallons;

HAP<sub>HI</sub>= highest HAP content of each coating and cleanup material, in pounds of highest individual HAP per gallon;

n = total number of coatings; and

n

$\sum_{i=1}^n (Y)$  is  $\leq 9.9$  tons highest individual HAP, as a rolling 12-month summation

Where:

n = months in the rolling, 12-month period.

(3) 
$$Z = \sum_{i=1}^n (G)(HAP_T)/2,000\text{lbs}$$

Where:

Z= tons of HAP<sub>T</sub> emissions per month;

G= monthly usage of each coating and cleanup material, in gallons;

HAP<sub>T</sub>= total HAP content of each coating and cleanup material, in pounds of total HAP per gallon; and

n = total number of coatings; and



$$\sum_{i=1}^n (Z) \text{ is } \leq 24.9 \text{ tons total HAP, as a rolling 12-month summation}$$

Where:

n = months in the rolling, 12-month period.

The permittee has sufficient monthly records of solvent usage and VOC and HAP emissions to begin calculating the rolling, 12-month summations upon final issuance of this permit. The calculations must include all spray nozzle cleaning and part lubrication solvent usage at the facility. Emissions of VOC from de minimis and permit exempt air contaminant sources at the facility shall not exceed 1.0 ton per year. Emissions of highest individual and total HAP from de minimis and permit exempt air contaminant sources at the facility shall not exceed 0.1 ton per year.

#### 4. Monitoring and/or Recordkeeping Requirements

- a) The permittee shall collect and record the following information each month for all coatings and cleanup materials employed in emissions units K001-K003, R002-R006 and R009, combined:
  - (1) the name and identification of each coating and cleanup material employed;
  - (2) the number of gallons of each coating applied;
  - (3) the number of gallons of each cleanup material employed;
  - (4) the maximum VOC content of each coating applied, in pounds per gallon;
  - (5) the maximum VOC content of each cleanup material employed, in pounds per gallon;
  - (6) the individual HAP content for each coating and cleanup material, for each HAP, in pounds per gallon;
  - (7) total HAP content for each coating and cleanup material in pounds per gallon;
  - (8) the total VOC emissions from all coatings and cleanup materials employed [the sum of ((2) times (4)) for all coatings plus ((3) times (5)) for all cleanup materials] divided by 2,000, in tons;
  - (9) the individual HAP emissions from all coatings and cleanup materials employed [the sum of ((2) times (6), for each HAP in all coatings plus ((3) times (6)) for each HAP in all cleanup materials] divided by 2,000, in tons;
  - (10) the total HAP emissions from all coatings and cleanup materials employed [the sum of (2) times (7)) for all coatings plus ((3) times (7)) for all cleanup materials] divided by 2,000, in tons;
  - (11) the rolling, 12-month summation of the total VOC emissions i.e., the summation of the total VOC emissions, as recorded in “(8)” above, for the present month plus the previous 11 months of operation, in ton(s), both on a per booth and combined basis;



- (12) the rolling, 12-month summation of the individual HAP emissions, i.e., the summation of the individual HAP emissions, as recorded in “(9)” above, for the present month plus the previous 11 months of operation, in ton(s); and
- (13) the rolling, 12-month summation of the total HAP emissions, i.e., the summation of the individual HAP emissions, as recorded in “(10)” above, for the present month plus the previous 11 months of operation, in ton(s).

[Note: A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings and cleanup materials.]

b) The federally enforceable permit-to-install and operate (FEPTIO) applications for emissions units K001-K003, R002-R006 and R009 were evaluated based on the actual materials and the design parameters of the emissions units’ exhaust systems, as specified by the permittee. The “Toxic Air Contaminant Statute”, ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled “Review of New Sources of Air Toxic Emissions, Option A”, as follows:

- (1) the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound emitted from the emissions units, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
  - a. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists’ (ACGIH) “Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices”; or
  - b. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists’ (ACGIH) “Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices”; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- (2) The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- (3) This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., “24” hours per day and “7” days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):



$$TLV(ug/m^3)/10 \times 8/24 \times 5/7 = 4 TLV(ug/m^3)/(24 \times 7) = MAGLC$$

- (4) The following summarizes the results of dispersion modeling for the or “worst case” toxic contaminant(s):

Toxic Contaminant: xylene (toluene, ethyl benzene, MIBK, TEA)

TLV (mg/m<sup>3</sup>): 434.19

Maximum Hourly Emission Rate (lbs/hr): 12.76

Predicted 1-Hour Maximum Ground Level Concentration (ug/m<sup>3</sup>): 3,712.27

MAGLC (ug/m<sup>3</sup>): 10,337.86

The permittee has demonstrated that emissions of xylene from emissions units K001-K003, R002-R006 and R009 are calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F).

- c) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

- (1) changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
- (2) changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
- (3) physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the “Toxic Air Contaminant Statute” will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a “modification” under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a “modification”, the permittee shall apply for and obtain a final PTI, PTIO, or FEPTIO (as applicable) prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.



- d) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
  - (1) a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
  - (2) the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
  - (3) a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
  - (4) the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- e) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

## 5. Reporting Requirements

- a) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- b) The permittee shall submit quarterly deviation (excursion) reports that identify:
  - (1) all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - a. VOC emissions from all coatings and cleanup materials used at the facility (emissions units K001-K003, R002-R006 and R009) shall not exceed 99.0 tons based on a rolling, 12-month summation.
    - b. Emissions of any single hazardous air pollutant (HAP) from the facility shall not exceed 9.9 tons based on a rolling, 12-month summation.
    - c. Total HAP emissions from the facility shall not exceed 24.9 tons based on a rolling, 12-month summation.



- (2) the probable cause of each deviation (excursion);
- (3) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- (4) the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- c) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum groundlevel concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions units, or the exhaust stacks have been made, then the report shall include a statement to this effect.

## 6. Testing Requirements

- a) Emissions Limitations:

VOC emissions from coatings and cleanup material use at the facility (emissions units K001-K003, R002-R006 and R009) shall not exceed 99.0 tons based on a rolling, 12-month summation.

Emissions of any single hazardous air pollutant (HAP) from coatings and cleanup material use at the facility (emissions units K001-K003, R002-R006 and R009) shall not exceed 9.9 tons based on a rolling, 12-month summation.

Total HAP emissions from coatings and cleanup material use at the facility (emissions units K001-K003, R002-R006 and R009) shall not exceed 24.9 tons based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with these emissions limitations shall be demonstrated by the recordkeeping in (4)a.

## 7. Miscellaneous Requirements

- a) None.



**Draft Permit-to-Install and Operate**

Meteor Sealing Systems LLC

**Permit Number:** P0108043

**Facility ID:** 0679015004

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

## **C. Emissions Unit Terms and Conditions**



**1. K002, Extrusion Line #2**

**Operations, Property and/or Equipment Description:**

Rubber gasket extrusion line originally installed in 2002; includes the application of coatings in a Global Manufacturing spray booth with 100% capture, equipped with dry particulate filters (98% control efficiency) and using HVLP spray guns, an electric curing oven and a tail printer; Chapter 31 modification in June of 2011 to increase the maximum allowable material usage rate to 19,360 gallons per year in the coating operation and 175 gallons per year of printer ink, make up and cleaning solution in the tail printer; supersedes PTIO P0105045 issued 9/30/09 for EU R001

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)	Volatile organic compound (VOC) emissions shall not exceed 47.14 tons per rolling, 12-month period.
b.	OAC rule 3745-31-05(D) (Synthetic minor restriction to avoid Title V requirements)	See B.2.a).
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Particulate emissions (PE) shall not exceed 0.064 pound per hour and 0.28 ton per year.  No visible PE from any stack serving this emissions unit.



**Draft Permit-to-Install and Operate**

Meteor Sealing Systems LLC

**Permit Number:** P0108043

**Facility ID:** 0679015004

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11(C).</p> <p>See b)(2)a. below.</p>
d.	<p>OAC rule 3745-31-05(C), as effective 12/01/06 (Voluntary restriction to avoid BAT requirements for PE)</p>	<p>See b)(2)b. below.</p>
e.	<p>OAC rule 3745-17-11(C)</p>	<p>See c)(1)-(2) and d(1)-(5) below.</p>

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulation for NAAQS pollutant emissions less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revision to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limits/control measures no longer apply.
- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

Federally Enforceable Permit to Install and Operate P0108043 for this air contaminant source takes into account the following voluntary restriction (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

- i. Apply all spray coatings within a spray booth with 100% capture and equipped with dry particulate filters with a minimum 98% control efficiency and the use HVLP spray guns with a minimum of 65% transfer efficiency; and
- ii. PE shall not exceed 0.28 ton per year.

c) Operational Restrictions

- (1) The permittee shall install, operate, and maintain a dry particulate filter system for the surface coating operation in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by



the permittee. The dry particulate filter shall be employed during all periods of coating application to control particulate emissions.

- (2) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (2) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (3) In addition to the recommended periodic inspections, not less than once each calendar year, the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (4) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (5) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications



made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emissions limitations and/or control requirements specified in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

VOC emissions shall not exceed 47.14 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the annual emissions limitation shall be demonstrated by the following calculation based on the information presented in the permittee's application:

$$\begin{aligned}
 \text{VOC (tons/yr)} &= [(\text{maximum coating use rate, in gallons per hour} \times \text{maximum VOC content of coating, as applied, in pounds of VOC per gallon}) + (\text{maximum printer material use rate} \times \text{VOC content of printer materials})] \times \text{maximum hours per year} \times 1 \text{ ton}/2,000 \text{ pounds} \\
 &= [(2.21 \text{ gallons per hour} \times 4.81 \text{ pounds VOC per gallon}) + (0.02 \text{ gallon per hour} \times 6.67 \text{ pounds VOC per gallon})] \times 8,760 \text{ hours per year} \times 1 \text{ ton}/2,000 \text{ pounds} \\
 &= 47.14 \text{ tons per rolling, 12-month period}
 \end{aligned}$$

Where:

- 2.21 gallons per hour = maximum hourly coating use rate;
- 4.81 pounds of VOC per gallon = maximum VOC content of coating, as applied;
- 0.02 gallon per hour = maximum printer material use rate; and
- 6.67 pounds of VOC per gallon = average VOC content of printer materials

USEPA Method 24 or formulation data shall be used to determine the VOC contents of the coatings and cleanup materials.



- b. Emissions Limitations:  
PE shall not exceed 0.064 pound per hour and 0.28 ton per year.

Applicable Compliance Method:

Compliance with the pound per hour emission limitation shall be demonstrated by the following calculation based on the information presented in the permittee's application:

$$\begin{aligned}
 \text{PE (lb/hr)} &= \text{maximum coating use rate, as applied, in gallons per hour} \\
 &\quad \times \text{maximum solids content of coating, as applied, in} \\
 &\quad \text{pounds of solids per gallon} \times \text{minimum \% transfer} \\
 &\quad \text{efficiency} \times \text{minimum \% control efficiency} \\
 &= 2.21 \text{ gallons per hour} \times 4.11 \text{ pounds of solids per gallon} \times \\
 &\quad (1-0.65) \times (1-0.98) \\
 &= 9.08 \times (1-0.65) \times (1-0.98) \\
 &= 0.064 \text{ pound per hour}
 \end{aligned}$$

Where:

2.21 gallons per hour = maximum hourly coating use rate, as applied;

65% = transfer efficiency of HVLP spray guns; and

98% = control efficiency for particulate filters.

If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

Compliance with the ton per year emission limitation shall be demonstrated by the following calculation:

$$\begin{aligned}
 \text{PE (ton/yr)} &= 0.064 \text{ lb PE/hr} \times 8,760 \text{ hr/yr} \times 1 \text{ ton}/2,000 \text{ lbs} \\
 &= 0.28 \text{ ton per year}
 \end{aligned}$$

- c. Emissions Limitation:  
No visible PE from any stack serving this emissions unit.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 22.

g) Miscellaneous Requirements

- (1) See B.4.b)-e) and B.5.c).



**2. R002, Robot Booth #1**

**Operations, Property and/or Equipment Description:**

Rubber gasket coating line originally installed in 1999; includes the application of coatings in an ABB Spray Booth, Model #IRB1400 with 100% capture, equipped with a dry particulate filters (98% control efficiency) and using robotic HVLP spray guns, a de minimis 0.25 million BTU natural gas-fired drying oven; Chapter 31 modification in June of 2011 to increase the maximum allowable material usage rate to 4,906 gallons per year of primer, 7,096 gallons per year of slipcoat, and 528 gallons per year of pre-cleaning solvent; supersedes PTIO P0105045 issued 9/30/09 for EU R002

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)	Volatile organic compound (VOC) emissions shall not exceed 19.67 tons per rolling, 12-month period.
b.	OAC rule 3745-31-05(D) (Synthetic minor restriction to avoid Title V requirements)	See B.2.a).
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Particulate emissions (PE) shall not exceed 0.017 pound per hour and 0.07 ton per year.  No visible PE from any stack serving this emissions unit.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>The requirements of this rule also include compliance with requirements of OAC rule 3745-17-11(C).</p> <p>See b)(2)a. below.</p>
d.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)b. below.
e.	OAC rule 3745-17-11(C)	See c)(1)-(2) and d(1)-(5) below.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulation for NAAQS pollutant emissions less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio’s State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revision to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally–approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limits/control measures no longer apply.
- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions from this air contaminant source since the uncontrolled potential to emit for particulate is less than 10 tons/yr.

c) Operational Restrictions

- (1) The permittee shall install, operate, and maintain a dry particulate filter system for the surface coating operation in accordance with the manufacturer’s recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The dry particulate filter shall be employed during all periods of coating application to control particulate emissions.
- (2) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (2) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (3) In addition to the recommended periodic inspections, not less than once each calendar year, the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (4) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (5) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.



- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emissions limitations and/or control requirements specified in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emissions Limitation:

VOC emissions shall not exceed 19.67 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the annual emissions limitation shall be demonstrated by the following calculations based on the information presented in the permittee's application:

$$\begin{aligned}
 \text{VOC (tons/yr)} &= [[(\text{maximum primer use rate, in gallons per hour} \times \text{maximum VOC content of primer, as applied, in pounds of VOC per gallon}) + (\text{maximum slipcoat use rate, in gallons per hour} \times \text{VOC content of slipcoat})] \times \text{maximum hours per year}] + (\text{maximum pre-cleaning solvent use rate, in gallons per year} \times \text{VOC content of pre-cleaning solvent})] \times 1 \text{ ton}/2,000 \text{ pounds} \\
 &= [[(0.56 \text{ gallon per hour} \times 6.99 \text{ pounds VOC per gallon}) + (0.81 \text{ gallon per hour} \times 0.22 \text{ pound VOC per gallon})] \times 8,760 \text{ hours per year}] + (528 \text{ gallons per year} \times 6.59 \text{ pounds VOC per gallon})] \times 1 \text{ ton}/2,000 \text{ pounds} \\
 &= 19.67 \text{ tons per rolling, 12-month period}
 \end{aligned}$$

Where:

- 0.56 gallon per hour = maximum hourly primer use rate;
- 6.99 pound of VOC per gallon = maximum VOC content of primer, as applied;
- 0.81 gallon per hour = maximum slipcoat use rate;
- 0.22 pound of VOC per gallon = maximum VOC content of slipcoat, as applied;
- 528 gallons = maximum amount of pre-cleaning solvent used per year; and
- 6.59 pounds of VOC per gallon = maximum VOC content of pre-cleaning solvent

USEPA Method 24 or formulation data shall be used to determine the VOC contents of the coatings and cleanup materials.

- b. Emissions Limitations:

PE shall not exceed 0.017 pound per hour and 0.07 ton per year.



Applicable Compliance Method:

Compliance with the pound per hour emission limitation shall be demonstrated by the following calculation based on the information presented in the permittee's application:

$$\begin{aligned}
\text{PE (lb/hr)} &= [(\text{maximum primer use rate, as applied, in gallons per hour} \\
&\quad \times \text{maximum solids content of primer, as applied, in pounds} \\
&\quad \text{of solids per gallon}) + (\text{maximum slipcoat use rate, as} \\
&\quad \text{applied, in gallons per hour} \times \text{maximum solids content of} \\
&\quad \text{slipcoat, as applied, in pounds of solids per gallon})] \times \\
&\quad \text{minimum \% transfer efficiency} \times \text{minimum \% control} \\
&\quad \text{efficiency} \\
&= [(0.56 \text{ gallon per hour} \times 0.28 \text{ pound of solids per gallon}) + \\
&\quad (0.81 \text{ gallon per hour} \times 2.75 \text{ pounds of solids per gallon})] \times \\
&\quad (1-0.65) \times (1-0.98) \\
&= 2.38 \times (1-0.65) \times (1-0.98) \\
&= 0.017 \text{ pound per hour}
\end{aligned}$$

Where:

0.56 gallon per hour = maximum hourly primer use rate;

0.28 pound of solids per gallon = maximum solids content of primer, as applied;

0.81 gallon per hour = maximum slipcoat use rate;

2.75 pounds of solids per gallon = maximum solids content of slipcoat, as applied;

65% = transfer efficiency of HVLP spray guns; and

98% = control efficiency for particulate filters

If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

Compliance with the ton per year emission limitation shall be determined based on the following calculation:

$$\begin{aligned}
\text{PE (ton/yr)} &= 0.017 \text{ lb PE/hr} \times 8,760 \text{ hr/yr} \times 1 \text{ ton}/2,000 \text{ lbs} \\
&= 0.07 \text{ ton per year}
\end{aligned}$$

- c. Emissions Limitation:  
No visible PE from any stack serving this emissions unit.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 22.

g) Miscellaneous Requirements

- (1) See B.4.b)-e) and B.5.c).



**3. R003, Robot Booth # 2**

**Operations, Property and/or Equipment Description:**

Rubber gasket coating line originally installed in August of 2011; includes the application of coatings in an ABB Spray Booth, Model #IRB1400 with 100% capture, equipped with a dry particulate filters (98% control efficiency) and using robotic HVLP spray guns, and a de minimis 0.30 million BTU natural gas-fired drying oven; Chapter 31 modification in October of 2011 to increase the maximum allowable material usage rate to 6,308 gallons per year of primer, 5,870 gallons per year of topcoat, and 365 gallons per year of pre-cleaning solvent; supersedes PTIO P0108529 issued 8/29/11

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)	Volatile organic compound (VOC) emissions shall not exceed 26.15 tons per rolling, 12-month period.
b.	OAC rule 3745-31-05(D) (Synthetic minor restriction to avoid Title V requirements)	See B.2.a).
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Particulate emissions (PE) shall not exceed 0.017 pound per hour and 0.08 ton per year.  No visible PE from any stack serving this emissions unit.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11(C).  See b)(2)a. below.
b.	OAC rule 3745-31-05(C), as effective 12/01/06	See b)(2)b. below.
c.	OAC rule 3745-17-07(A)	See b)(2)c. below.
d.	OAC rule 3745-17-11(C)	See c)(1) and (2) below.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulation for NAAQS pollutant emissions less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revision to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limits/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

Federally Enforceable Permit to Install and Operate P0108043 for this air contaminant source takes into account the following voluntary restriction (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

- i. Apply all spray coatings within a spray booth with 100% capture and equipped with dry particulate filters with a minimum 98% control efficiency and the use HVLP spray guns with a minimum of 65% transfer efficiency; and
- ii. PE shall not exceed 0.08 ton per year.

c) Operational Restrictions

(1) The permittee shall install and operate a dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.



- (2) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (2) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (3) In addition to the recommended periodic inspections, not less than once each calendar year, the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (4) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (5) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.



e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emissions limitations and/or control requirements specified in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

VOC emissions from coating operations shall not exceed 26.15 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the annual emissions limitation shall be demonstrated by the following calculations based on the information presented in the permittee's application:

$$\begin{aligned}
 \text{VOC (tons/yr)} &= [[(\text{maximum primer use rate, in gallons per hour} \times \text{maximum VOC content of primer, as applied, in pounds of VOC per gallon}) + (\text{maximum topcoat use rate, in gallons per hour} \times \text{VOC content of slipcoat})] \times \text{maximum hours per year}] + (\text{maximum pre-cleaning solvent use rate, in gallons per year} \times \text{VOC content of pre-cleaning solvent})] \times 1 \text{ ton}/2,000 \text{ pounds} \\
 &= [[(0.70 \text{ gallon per hour} \times 7.10 \text{ pounds VOC per gallon}) + (0.67 \text{ gallon per hour} \times 1.13 \text{ pounds VOC per gallon})] \times 8,760 \text{ hours per year}] + (365 \text{ gallons per year} \times 5.81 \text{ pounds VOC per gallon}) \times 1 \text{ ton}/2,000 \text{ pounds} \\
 &= 26.15 \text{ tons per rolling, 12-month period}
 \end{aligned}$$

Where:

0.70 gallon per hour = maximum hourly primer use rate for worst-case primer;  
7.10 pounds of VOC per gallon = maximum VOC content of worst-case primer, as applied;

0.67 gallon per hour = maximum topcoat use rate;

1.13 pounds of VOC per gallon = maximum VOC content of slipcoat, as applied;

365 gallons = maximum amount of pre-cleaning solvent used per year; and

5.81 pounds of VOC per gallon = maximum VOC content of pre-cleaning solvent



USEPA Method 24 or formulation data shall be used to determine the VOC contents of the coatings and cleanup materials.

- b. Emissions Limitations:  
PE shall not exceed 0.017 pound per hour and 0.08 ton per year.

Applicable Compliance Method:

Compliance with the pound per hour emission limitation shall be demonstrated by the following calculation based on the information presented in the permittee's application:

$$\begin{aligned}
 \text{PE (lb/hr)} &= [(\text{maximum primer use rate, in gallons/hr})(\text{maximum solids content of primer}) + (\text{maximum topcoat use rate, in gallons per hour})(\text{maximum solids content of topcoat})] \times 65\% \text{ transfer efficiency} \times 98\% \text{ control efficiency} \\
 &= [(0.72 \text{ gallon per hour primer} \times 0.284 \text{ lb solids per gallon}) + (0.67 \text{ gallons per hour topcoat} \times 3.33 \text{ lbs solids per gallon, as mixed})] \times (1-0.65) \times (1-0.98) \\
 &= (0.204 + 2.23) \times (1-0.65) \times (1-0.98) \\
 &= 0.017 \text{ pound per hour}
 \end{aligned}$$

Where:

0.72 gallon per hour = maximum hourly primer use rate;

0.284 pound of solids per gallon = worst case maximum solids content of primer, as applied;

0.67 gallon per hour = maximum topcoat use rate;

3.33 pounds of solids per gallon = maximum solids content of topcoat, as applied;

65% = transfer efficiency of HVLP spray guns; and

98% = control efficiency for particulate filters

If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

Compliance with the ton per year emission limitation shall be determined based on the following calculation:

$$\begin{aligned}
 \text{PE (ton/yr)} &= 0.017 \text{ lb/hr} \times 8,760 \text{ hr/yr} \times 1 \text{ ton}/2,000 \text{ lbs} \\
 &= 0.08 \text{ ton per year}
 \end{aligned}$$

- c. Emissions Limitation:  
No visible PE from any stack serving this emissions unit.



**Draft Permit-to-Install and Operate**

Meteor Sealing Systems LLC

**Permit Number:** P0108043

**Facility ID:** 0679015004

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

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 22.

- g) Miscellaneous Requirements
  - (1) See B.4.b)-e) and B.5.c).