



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center  
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Columbus, OH 43215

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Lazarus Gov. Center  
P.O. Box 1049  
Columbus, OH 43216-1049

RE: **FINAL PERMIT TO INSTALL MODIFICATION CERTIFIED MAIL**

MIAMI COUNTY  
Application No: 08-03618

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

DATE: 10/12/2000

American Matsushita Electronics Company  
Steve Fogle  
1400 West Market St  
Troy, OH 45373

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

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
236 East Town Street, Room 300  
Columbus, Ohio 43215

Very truly yours,

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

CC: USEPA

RAPCA

## FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 08-03618

Application Number: **08-03618**APS Premise Number: **0855140417**Permit Fee: **\$100**Name of Facility: **American Matsushita Electronics Company**Person to Contact: **Steve Fogle**Address: **1400 West Market St****Troy, OH 45373**

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

**1400 West Market St  
Troy, OHIO**

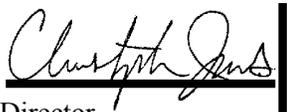
Description of modification:

**Modification of B005 in PTI 08-3618 issued October 1, 1997, due to changes of the AP-42 emission factors.**

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Director

**GENERAL PERMIT CONDITIONS**

**TERMINATION OF PERMIT TO INSTALL**

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

**NOTICE OF INSPECTION**

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

**CONSTRUCTION OF NEW SOURCES**

The proposed source(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 source(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 Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet applicable standards.

**PERMIT TO INSTALL FEE**

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

**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.

**APPLICABILITY**

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

**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.

**PERMIT TO OPERATE APPLICATION**

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

**SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION**

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

## AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **American Matsushita Electronics Company** located in **MIAMI** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
B005	Boiler #5; 21 MMBtu/hr; natural gas	Compliance with applicable rules and specified emission rates through the use of natural gas; record keeping and reporting.	3745-31-05 3745-17-10(A) 3745-17-10(B)(1) 40 CFR Part 60 Subpart Dc	0.020 lb particulate/MMBtu actual heat input, 1.84 TPY particulate emissions; 0.03 lb/MMBtu sulfur dioxide (SO <sub>2</sub> ), 2.76 TPY SO <sub>2</sub> ; 0.15 lb/MMBtu carbon monoxide (CO), 13.75 TPY CO; 0.12 lb/MMBtu nitrogen dioxide (NO <sub>x</sub> ), 10.78 TPY NO <sub>x</sub> ; 0.016 lb/MMBtu organic compound (OC), 1.47 TPY OC
K013	D-105, 106, 107 lacquer ctg	Compliance with applicable rules and specified emission rates through the application of permanent total enclosure for 100% capture; fume concentrator followed by catalytic incineration with 90% overall control efficiency; record keeping and reporting.	3745-31-05 3745-21-07(G)(2)	1.00 lb/hr (excluding cleanup), 28.00 lbs/day 5.11 TPY OC (including cleanup).

<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
P036	D - 1 1 4 n e c k cleaning	Compliance with applicable rules and specified emission rates; record keeping and reporting.	3745-31-05 3745-15-07	40.00 lbs/day, 7.30 TPY Methanol
P020	D-105-2 lacquer m i x i n g (*modification)	Compliance with applicable rules and specified emission rates through total enclosure of room with air sweeping action at two levels and venting to fume concentrator followed by catalytic incinerator with 90% overall control efficiency; record keeping and reporting.	3745-31-05 3745-21-07(G)(2)	0.37 lb/hr, 8.82 lbs/day, 1.61 TPY OC

\*This modification represents an increase in mixing production and an associated emissions increase of 0.04 pound/hour, 0.90 pound/day, and 0.22 TPY. The combined allowable VOC emissions from the common control systems and exhaust stacks serving emission units K001, K002, and P020 are also increasing by like amounts to 2.91 pounds/hour, 95.78 pounds/day, and 16.83 TPY.

**SUMMARY**  
**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons/Year</u>
Particulate	1.84
NO <sub>x</sub>	10.78
SO <sub>2</sub>	2.76
CO	13.75
Organic Compounds	15.49

**NSPS REQUIREMENTS**

The following sources are subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

<u>Source No.</u>	<u>Source Description</u>	<u>NSPS Regulation (Subpart)</u>
B005	Boiler #5	Dc

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

- a. construction date (no later than 30 days after such date);
- b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. actual start-up date (within 15 days after such date); and
- d. date of performance testing (If required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency  
DAPC - Air Quality Modeling and Planning  
P.O. Box 1049  
Columbus, OH 43216-1049

and Regional Air Pollution Control Agency, 451 W. Third Street, Dayton, Ohio 45422.

**RECORD(S) RETENTION AND AVAILABILITY**

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

**REPORTING REQUIREMENTS**

Unless otherwise specified, reports required by the Permit to Install need only be submitted to Regional Air Pollution Control, 451 West Third Street, Dayton, Ohio 45422.

**WASTE DISPOSAL**

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

### **MAINTENANCE OF EQUIPMENT**

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

### **MALFUNCTION/ABATEMENT**

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the Regional Air Pollution Control, 451 West Third Street, Dayton, Ohio 45422.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

### **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.

### **ADDITIONAL SPECIAL TERMS AND CONDITIONS**

- A. Volatile organic compound emissions from emission unit K013 D105/106/107 lacquer coating shall be controlled through the application of a cartridge filter for particulate removal and a VOC fume concentrator system followed by a catalytic incinerator.

The overall VOC removal/destruction efficiency for this control system shall be at least 90 percent.

Emissions of volatile organic compound emissions from emissions unit K013 (C-105/106/107), including cleanup solvent emissions, shall be totally (100 percent) captured by way of "permanent total enclosure" and vented to the identified emission control system.

Emission of volatile organic compound emissions from emission unit P020, lacquer mixing, shall continue to be totally (100 percent) captured by way of enclosed design with exhaust ducts situated at two levels to "sweep" and collect fugitive emissions and vented to the identified emissions control system. (Ref: PTI No. 08-3404)

**B. Emission Unit K013 (D-105/106/107), Permanent Total Enclosure**

1. Emissions unit K013, lacquer coating, shall be equipped with a permanent total enclosure (PTE) which shall be installed and operated in accordance with 40 CFR Part 51, Appendix M, Method 204. The PTE shall meet the following criteria:
  - a. any "Natural Draft Opening" (NDO) shall be at least 4 equivalent diameters from each VOC emission point;
  - b. the total area of all NDOs shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;
  - c. the average facial velocity (FV) of air through all NDOs shall be at least 3,600 m/hr (200 fpm) which corresponds to a pressure differential of 0.004 inches of H<sub>2</sub>O. The direction of air through all NDOs shall be into the enclosure;
  - d. all access doors and windows whose area are not included in paragraph b are not included in the calculation in paragraph c and shall be closed during routine operation; and,
  - e. all VOC emission must be captured and contained for discharge through the VOC control device.

By satisfying the criteria above for establishing permanent total enclosure, the total organic capture efficiency shall be assumed to be 100 percent.

Definitions for PTE and NDO:

Permanent Total Enclosure (PTE) - A permanently installed enclosure that completely surrounds a source of emissions such that all VOC emissions are captured and contained for a discharge through a control device.

Natural Draft Opening (NDO) - Any permanent opening in the enclosure that remains open during operation of the facility and is not connected to a duct to which a fan is installed.

**C. Operational Restrictions**

1. Permanent Total Enclosure Operational Restriction

The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential of 0.007 inches of water, as a three hour average.

2. Catalytic Incinerator Operational Restriction

The average temperature of the exhaust gases at the inlet to the catalytic incinerator, for any 3-hour block of time, 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.

3. NSPS Operational Restriction

Fuel usage in emission unit B005 is limited to natural gas.

**D. Monitoring and/or Record keeping Requirements**

\*\*The pounds/hour limitations specified in this permit were established for PTI purposes to reflect the potential to emit for the emission unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with these limitations.\*\*

1. This facility shall maintain daily records of the following:

a. for the emission unit K013, lacquer coating:

- i. pounds lacquer and toluene inputs;
- ii. pounds lacquer and toluene reclaim;
- iii. pounds lacquer and toluene waste;
- \*iv. pounds toluene stripped from waste water; and,
- v. pounds cleanup solvent (independent of toluene used for production).

\*This daily factor may be determined by way of a material balance based on the measured amounts of factors a, b, and c, K013.

b. for emission unit P020, lacquer mixing:

- i. pounds of toluene mixed; and,
- ii. pounds of solids mixed.

c. for emission unit P036 neck cleaning;

- i. pounds of methal.

2. Catalytic Incinerator Temperature Monitoring and Record keeping Requirements

- a. the permittee shall install, operate, and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature of the exhaust gases at the inlet (immediately before the catalyst bed) and at the outlet from the catalytic incinerator. Units shall be in degrees Fahrenheit. The continuous monitoring and recording devices shall be capable of accurately measuring the desired parameters and the owner or operator shall properly operate and maintain the devices in accordance with the manufacturer's recommendations.
- b. the permittee shall collect and record the following information each day:
  - i. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and,
  - ii. all three-hour periods of operation during which the average combustion temperature was more than fifty degrees Fahrenheit below the average combustion temperature during the most recent performance test that the emissions unit was in compliance.

3. Permanent Total Enclosure Monitoring and Record keeping Requirements

- a. the permittee shall install, maintain and operate monitoring devices and a recorder which continuously measure the pressure inside and outside the permanent total enclosure and record the pressure differential. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. The average differential pressure across the permanent total enclosure for any 3-hour block of time shall not be less than 0.007 inches of H<sub>2</sub>O.
- b. the permittee shall record and maintain the following information on a daily basis:
  - i. the difference in pressure between the permanent total enclosure and the surrounding area(s); and,
  - ii. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

4. NSPS Record keeping Requirement

This facility shall maintain daily records of the natural gas usage (million ft<sup>3</sup>) for emission unit B005.

5. Calculation of Daily Emission Rates

- a. for emission unit K013, lacquer coating, the daily toluene emission rate shall be determined in accordance with the following equation:

$$[a(\text{percent toluene, vol.})(7.26) + b(7.26)] - [c(\text{percent toluene, vol.})(7.26) + d(\text{percent toluene, vol.})(7.26)](1-.90) = x \text{ pounds/day}$$

Where:

- a - gallons of lacquer suspension material
- b - gallons of toluene cleanup
- c - gallons of reclaim lacquer
- d - gallons of waste lacquer
- x - pounds/day toluene emission rate

- b. for emission unit P020, lacquer mixing, the daily toluene emission rate shall be determined in accordance with the following equation:

$$a(0.05)_1(1-.90)_2 = x \text{ pounds/day}$$

Where:

- a - toluene input (pounds)
- x - pounds/day toluene
- 1 - 5 percent fugitive OC emission loss
- 2 - 90 percent overall OC emission control

- c. for emission unit P036, Neck cleaning, the daily organic compounds (methanol) emission rate shall be determined in accordance with the following equation:

$$(a - b) = x \text{ pounds/day}$$

Where:

- a - methanol input (pounds)
- b - total recovered spent solvent (pounds)
- x - organic compound emission rate (pounds/day)

**E. Reporting Requirements**

1. This facility shall notify the Regional Air Pollution Control Agency of any daily record showing an exceedance of the daily allowable emission rate for K013, P020, and P036. The notifications shall be in writing and in accordance with the quarterly deviation (excursion) reporting requirement in Term and Condition E.5.
2. This facility shall submit semi-annual reports which list the total process material usage inputs and the total organic compound emission rate for each month for each of the emission units K013, P036, and P020. The reports shall be submitted by February 15 and August 15 and shall cover the previous six calendar months (July through December and January through June, respectively.)
3. Catalytic Incinerator Temperature Reporting Requirements
  - a. the permittee shall submit temperature deviation (excursion) reports that identify all 3-hour blocks of time during which the average temperature of the exhaust gases immediately before the catalyst bed does not comply with the temperature limitations specified above.
4. Permanent Total Enclosure Reporting Requirements
  - a. the permittee shall submit pressure differential deviation (excursion) reports that identify all 3-hour blocks of time during which the permanent total enclosure was not maintained at or above the required differential pressure of 0.007 inches of H<sub>2</sub>O.
5. The permittee shall submit quarterly deviation (excursion) reports in the following manner:
  - a. reports of any required monitoring and/or record keeping information shall be submitted to the Regional Air Pollution Control Agency; and,
  - b. except as otherwise may be provided in the terms and conditions for a specific emission unit, quarterly written reports of (a) any deviations (excursion) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping 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 Regional Air Pollution Control 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.)

**F. Testing Requirements**

1. Performance Test Requirements

The permittee shall conduct, or have conducted, performance testing of the subject air contaminant source(s) in accordance with procedures approved by the Agency. A copy of the written report shall be submitted and signed by the person responsible for the test, describing the test procedures followed and the results of such tests. The Director or an Ohio EPA representative shall be allowed to witness the tests, examine testing equipment and require the acquisition or submission of data and information necessary to assure that source operation and testing procedures provide a valid characterization of the emissions from the source and/or the performance of the control equipment.

- a. a completed Intent to Test form shall be submitted to the Regional Air Pollution Control Agency where the original permit application was filed. This notice shall be made thirty (30) days in advance and shall specify the source operation parameters, the proposed test procedures and the time, date, place and person(s) conducting such tests.
- b. a copy of the test results shall be submitted within thirty (30) days after the completion of the performance test.
- c. tests shall be performed for the following sources and pollutants:

<u>Source Numbers</u>	<u>Exhaust Stack</u>	<u>Pollutants</u>
K013	107	total organic compounds

Additionally, emission testing shall be conducted to determine:

- i. the overall control efficiency for the fume concentrator/catalytic incinerator emission control system and the destruction efficiency for the catalytic incinerator associated with emission units K013.
2. Performance testing shall be done in accordance with the test methods and procedures specified in OAC rules 3745-21-10(B) and (C).

3. Compliance Methodologies

Compliance with the emission limitation(s) in of these terms conditions shall be determined in accordance with the following method(s):

**For B005**

a. Emission Limitation -

2.93 pounds/hour NO<sub>x</sub>,  
0.01 pound/hour SO<sub>2</sub>,  
0.73 pound/hour CO, and  
0.12 pound/hour OC

Applicable Compliance Method -

Compliance shall be determined by multiplying the AP-42 emission factors for natural gas (for SO<sub>2</sub>, 0.6 pound/MM cubic foot; for NO<sub>x</sub>, 140 pounds/MM cubic foot; for CO, 35 pounds/MM cubic foot; and for OC, 5.8 pounds/MM cubic foot) by the maximum hourly gas burning capacity (20,925 cubic feet) of the emissions unit.

b. Emission Limitation -

1.84 TPY PM,  
12.83 TPY NO<sub>x</sub>,  
0.04 TPY SO<sub>2</sub>,  
3.20 TPY CO, and  
0.52 TPY OC

Applicable Compliance Method -

Compliance with the annual limitations shall be determined by multiplying the hourly allowable emission rates by 8760 hours/year and dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly limitation, compliance is shown with the annual limitation.

c. Emission Limitation -

0.020 pound/MMBtu PM

Applicable Compliance Method -

Compliance shall be based upon multiplying the maximum hourly gas burning capacity of the emissions unit (20,925 cubic feet/hour) by the AP-42 emission factor for natural gas (6.2 pounds/MM cubic foot) and dividing by the maximum hourly heat input capacity of the emissions unit (21 MMBtu/hour).

**For K013**

a. Emission Limitation -

1.0 pound/hour OC, excluding cleanup

Applicable Compliance Method -

Compliance shall be determined by multiplying the maximum hourly lacquer coating usage by the VOC content of the coating (7.26 pounds VOC/gallon) and multiplying the product by a factor of 1 minus the minimum overall control efficiency, 90 percent. Compliance shall also be based on stack testing per OAC rule 3745-21-10.

b. Emission Limitation -

28.00 pounds/day OC, including cleanup

Applicable Compliance Method -

Compliance shall be determined by performing the calculation as specified in Term and Condition D.6.a.

c. Emission Limitation -

5.11 TPY OC, including cleanup

Applicable Compliance Method -

Compliance shall be determined by summing the daily organic compound emission rate calculations, from above, for the calendar year and dividing by 2000.

**For P036**

- a. Emission Limitation -

40.00 pounds/day Methanol

Applicable Compliance Method -

Compliance shall be determined by performing the calculation as specified in Term and Condition D.5.c.

- b. Emission Limitation -

7.30 TPY Methanol

Applicable Compliance Method -

Compliance shall be determined by summing the daily organic compound (methanol) emission rate calculations, from above, for the calendar year and dividing by 2000.

**For P020**

- a. Emission Limitation -

0.37 pound/hour OC

Applicable Compliance Method -

Compliance shall be determined by multiplying the maximum hourly toluene mixed by the fugitive OC emission loss (0.05) and multiplying the product by a factor of 1 minus the overall control efficiency, 90 percent.

- b. Emission Limitation -

8.82 pounds/day OC

Applicable Compliance Method -

Compliance shall be determined by performing the calculation as specified in Term and Condition D.5.b.

c. Emission Limitation -

1.61 TPY OC

Applicable Compliance Method -

Compliance shall be determined by summing the daily organic compound emission rate calculations, from above, for the calendar year and dividing by 2000.

**G. Miscellaneous Requirements**

1. Preventive Maintenance and Malfunction Abatement Plan

- a. this facility shall initiate and maintain a Preventive Maintenance and Malfunction Abatement Plan (PM & MAP) designed to ensure the control equipment is operating in accordance with the manufacturer's specifications. Such a PM & MAP shall outline the specific steps taken and/or the specific items checked on a routine basis to ensure the proper operation of the control equipment.

the PM & MAP shall be in writing and shall be submitted to the Regional Air Pollution Control Agency within 30 days of startup of these emissions units.

2. Deminimis Emission Activities

- a. the following is a listing of emission activities identified within the PTI No. 08-03618 application that were determined to be de minimis pursuant to OAC rule 3745-15-05.

Bulb Process

D-101-1	Washing
D-101-2	Reform Washing
D-102	Settling
D-103-104	Neck Cleaning and Drying
D-108	Internal DAG Coating
D-109	Drying
D-110	Aluminizing
D-111	Baking
D-112	Inspection
D-113	Tapping

Electron Gun Process

D-201	Washing
D-202	Getter Welding
D-203	Inspection
D-204	Ionized Air Blow

Tube Process

D-301	Sealing
D-302	Pumping
D-303	Capping
D-304	Getter Flashing
D-305	Aging
D-306-307	Bombard and Sparking
D-308	Sweeping
D-309	First Inspection
D-310	Outer DAG Coating
D-311	Drying
D-312-313	Labeling and Packaging