



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

9/23/2013

Mike Wittman
AMERICAN TRIM LLC - PRODUCT CENTER 4
1501 Michigan St
Sidney, OH 45365

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0306020025
Permit Number: P0115366
Permit Type: Renewal
County: Auglaize

Certified Mail

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

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-NWDO



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
AMERICAN TRIM LLC - PRODUCT CENTER 4**

Facility ID:	0306020025
Permit Number:	P0115366
Permit Type:	Renewal
Issued:	9/23/2013
Effective:	9/23/2013
Expiration:	9/23/2018



Division of Air Pollution Control
Permit-to-Install and Operate
for
AMERICAN TRIM LLC - PRODUCT CENTER 4

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Final Permit-to-Install and Operate
AMERICAN TRIM LLC - PRODUCT CENTER 4
Permit Number: P0115366
Facility ID: 0306020025
Effective Date: 9/23/2013

Authorization

Facility ID: 0306020025
Application Number(s): A0048724
Permit Number: P0115366
Permit Description: Renewal FEPTIO for two screen printing lines and two screen washing units.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 9/23/2013
Effective Date: 9/23/2013
Expiration Date: 9/23/2018
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

AMERICAN TRIM LLC - PRODUCT CENTER 4
713 S MAPLE ST
Wapakoneta, OH 45895

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

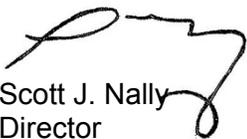
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

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: P0115366
 Permit Description: Renewal FEPTIO for two screen printing lines and two screen washing units.

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

Group Name: Screen Printing Group

Emissions Unit ID:	K004
Company Equipment ID:	CLEAN ROOM #3
Superseded Permit Number:	03-17409
General Permit Category andType:	Not Applicable
Emissions Unit ID:	K005
Company Equipment ID:	CLEAN ROOM #2
Superseded Permit Number:	03-17409
General Permit Category andType:	Not Applicable

Group Name: Screen Washing Group

Emissions Unit ID:	P005
Company Equipment ID:	CR2 screen wash
Superseded Permit Number:	P0103619
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P006
Company Equipment ID:	Clean Room 3, screen wash
Superseded Permit Number:	P0103619
General Permit Category andType:	Not Applicable



Final Permit-to-Install and Operate
AMERICAN TRIM LLC - PRODUCT CENTER 4
Permit Number: P0115366
Facility ID: 0306020025
Effective Date: 9/23/2013

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, Northwest 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 submitting¹ 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.

¹ 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.



Final Permit-to-Install and Operate
AMERICAN TRIM LLC - PRODUCT CENTER 4
Permit Number: P0115366
Facility ID: 0306020025
Effective Date: 9/23/2013

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) None.
 - 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) None.



Final Permit-to-Install and Operate
AMERICAN TRIM LLC - PRODUCT CENTER 4
Permit Number: P0115366
Facility ID: 0306020025
Effective Date: 9/23/2013

C. Emissions Unit Terms and Conditions



1. Emissions Unit Group -Screen Printing Group: K004,K005,

EU ID	Operations, Property and/or Equipment Description
K004	Screen printing operation including: 4 screen printing machines, 2 roll coaters, and 7 natural gas ovens (Clean Room 3).
K005	Screen printing operation including: 1 five-station ultra-violet screen printing processor, 2 roll coaters, and 7 natural gas ovens (Clean Room 2).

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. b)(2)f., g)(1).

(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)(2)b., c)(1), d)(2), d)(3), e)(1), f)(1).b, and f)(1)c.

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.	OAC rule 3745-31-05(A)(3)	2.18tons organic compounds (OC) per month; 26.2 tons OC per year(from clean-up operations -for emissions units K004 and K005 combined) See b)(2)a.
b.	OAC rule 3745-31-05(D)	63 tons OC per rolling 12-month period (from coating and cleanup operations -for emissions unit K004 and K005 combined) 9.5 tons per rolling 12-month period for any individual Hazardous Air Pollutant(HAP); 24 tons per rolling 12-month period for any combination of HAPs (for emissions units K004, K005, K006,



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		P005, and P006, combined) See b)(2)b. and c)(1).
c.	OAC rule 3745-21-09(U)(1)(c)	3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, for an extreme performance coating (daily volume-weighted average)
d.	OAC rule 3745-21-07(M)	See b)(2)c.
e.	ORC 3704.03 (F)(4)(b) OAC rule 3745-114-01	See g)(1).

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(c) and OAC rule 3745-31-05(D).
- b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding the requirements of OAC rule 77 (i.e. Title V operating permit regulations) and 40 CFR 63 Subpart M:
 - i. 63 tons OC per rolling 12-month period, from coating and cleanup operations, for emissions unit K004 and K005 combined [See c)(1)]. Emission limitation(s) on OC effectively limit emissions of volatile organic compounds (VOC).
 - ii. 9.5 tons per rolling 12-month period for any individual HAP, and 24 tons per rolling 12-month period for total HAPs, for emissions units K004, K005, K006, P005, and P006 combined.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the coating usage, upon issuance of this permit.

- c. OAC rule 3745-21-07(M)(2) is not applicable to this emissions unit group, pursuant to OAC 21-07(M)(3)(a)(iv).

c) Operational Restrictions

- (1) The maximum rolling 12-month quantity of OC-containing materials employed in emissions units K004 and K005 combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_n [(V_i)(G_i) (1 \text{ ton} / 2000 \text{ lbs})] \leq 63.0$$



where,

- M = the increment of the rolling 12-month period
- V_i = OC content, in pounds per gallon, of each material employed
- G_i = gallons used of each OC containing material for the rolling 12-month period
- n = total number of unique OC containing materials employed

The applicant shall use the existing records to determine compliance upon start-up under this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

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

- (1) The permittee shall collect and record the following information each day for the coating line:
 - a. the name and identification number of each coating employed;
 - b. the VOC content (excluding water and exempt solvents) of each coating, as applied;
 - c. the number of gallons (excluding water and exempt solvents) of each coating, as applied;
 - d. the daily VOC emissions from all the coatings employed, in pounds, [i.e., the sum of d)(2)b. times d)(2)c. for each coating employed]; and
 - e. the daily volume-weighted average VOC content of all the coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{VOC,2}$.
- (2) The permittee shall collect and record the following information each month, for all coatings and clean-up materials employed in emissions unit K004 and K005 combined:
 - a. the name and identification number of each coating and cleanup material employed;
 - b. the OC content of each coating and cleanup material employed, in pounds per gallons, as applied;
 - c. the volume, in gallons, of each coating and cleanup material employed;
 - d. the OC emission rate for each coating and cleanup material employed [d)(2)b. x d)(2)c.], in pounds;
 - e. the rolling 12-month OC emission rate, for all coatings and cleanup materials, in tons [summation of d)(2)d.]; and
 - f. the annual, year-to-date OC emissions, for all cleanup materials, in tons [i.e., summation of d)(2)d. for each calendar month, to date, from January to December].



Note: The information required above for coatings must be recorded for the materials 'as applied', including any thinning solvents added at the emissions unit.

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

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

- (3) The permittee shall collect and record the following information each month, for emissions units K004, K005, K006, P005, and P006, combined:
- a. the company identification of each coating and cleanup material employed;
 - b. the pounds per gallon of each HAP in each coating and cleanup material employed;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the total emissions rate for each HAP from all coatings and cleanup materials employed [summation of each HAP emissions rate [d)(3)b. x d)(3)c.] for each individual coating and cleanup material employed, in pounds;
 - e. the total HAP rate for the combination of all HAPs, from all coatings and cleanup materials employed [summation of d)(3)d. for all HAPs], in pounds; and
 - f. the rolling 12-month individual HAP [i.e. from d)(3)d.] and combined HAPs [i.e. from d)(3)e.] emission rates, in tons.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. 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:
 - i. all exceedances of the rolling 12-month organic compound emissions limitation of 63.0 tons from coating and cleanup material operations for emissions units K004 and K005 combined;
 - ii. all exceedances of the rolling 12-month individual HAP and combined HAPs emission limitations of 9.5 and 24 tons, respectively for emissions units K004, K005, K006, P005, and P006, combined; and



- iii. allexceedances of the material usage restriction in c)(1).
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. 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).

- (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 eBusiness 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 section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
2.18tons OC per month; 26.2 tons OC per yr
(from clean-up operations -for emissions units K004 and K005 combined)

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in d)(2).
 - b. Emission Limitation:
63.0 tons OC per rolling 12-month period (from coating and cleanup operations - for emissions unit K004 and K005 combined)

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in d)(2).
 - c. Emission Limitation:
9.5 tons per rolling 12-month period for any individual HAP; 24 tons per rolling 12-month period for any combination of HAPs
(for emissions units K004, K005, K006, P005, and P006, combined)



Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(3).

d. Emission Limitation:

3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, for an extreme performance coating (daily volume-weighted average)

e. Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(1).

- (2) Formulation data, or USEPA Method 24 or 311, shall be used to determine the VOC /OC /HAP content of each coating /solvent material.

g) Miscellaneous Requirements

- (1) Compliance with Ohio EPA's "Air Toxics Policy" was previously demonstrated in PTI 03-10257, issued on October 29, 1997, for the following pollutants associated with coatings employed in emissions units K004 and K005:

2-ethoxy ethanol
dipropylene glycol mono-methyl ether
toluene
methyl ethyl ketone

PTI 03-17409 did not result in an increase of any of the above mentioned pollutants and as such, air toxic modeling to demonstrate compliance with the "Toxic Air Contaminant Statute" in ORC 3704.03(G)(4)(b) was not required for these pollutants.

PTI 03-17409 did result in the emissions of new toxic air contaminants, however, modeling to demonstrate compliance with the "Toxic Air Contaminant Statute" in ORC 3704.03 (G)(4)(b) was not necessary because the emissions unit's maximum annual emissions for each new toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for an obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.



2. Emissions Unit Group -Screen Washing Group: P005,P006,

EU ID	Operations, Property and/or Equipment Description
P005	Clean room 2, screen washer
P006	Clean room 3, screen washer.

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. d)(3) through d)(6).

(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(2)b., d)(2), e)(1) and f)(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.	OAC rule 3745-31-05(A)(3)	0.61tons organic compounds (OC) per month; 7.3 tons OC per year(emissions units P005andP006 combined) See b)(2)a.
b.	OAC rule 3745-31-05(D)	9.5 tons per rolling 12-month period for any individual Hazardous Air Pollutant(HAP); 24 tons per rolling 12-month period for any combination of HAPs (for emissions units K004, K005, K006, P005, and P006, combined) See b)(2)b.ii.
c.	OAC rule 3745-21-07(M)	See b)(2)c.



(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(c) and OAC rule 3745-31-05(D).
- b. This permit establishes the following federally enforceable emission limitations for purposes of avoiding the requirements of OAC rule 77 (i.e. Title V operating permit regulations) and 40 CFR 63 Subpart M:
 - i. 9.5 tons per rolling 12-month period for any individual HAP, and 24 tons per rolling 12-month period for total HAPs, for emissions units K004, K005, K006, P005, and P006 combined.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the coating usage, upon issuance of this permit.

- c. OAC rule 3745-21-07(M)(2) is not applicable to this emissions unit group, pursuant to OAC 21-07(M)(3)(a)(iv).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions unit P005 and P006 combined:
 - a. the name and identification number of each cleaning material employed;
 - b. the OC content of each cleaning material employed, in pounds per gallons, as applied;
 - c. the volume, in gallons, of each cleaning material employed;
 - d. the OC emission rate for each cleaning material employed $[d)(1)b. \times d)(1)c.]$, in pounds; and
 - e. the annual, year-to-date OC emissions, for all cleaning materials, in tons [i.e., summation of $d)(1)d$ for each calendar month, to date, from January to December].

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

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



- (2) The permittee shall collect and record the following information each month, for emissions units K004, K005, K006, P005, and P006, combined:
- a. the company identification of each coating and cleanup material employed;
 - b. the pounds per gallon of each HAP in each coating and cleanup material employed;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the total emissions rate for each HAP from all coatings and cleanup materials employed [summation of each HAP emissions rate [d)(2)b. x d)(2)c.] for each individual coating and cleanup material employed, in pounds;
 - e. the total HAP rate for the combination of all HAPs, from all coatings and cleanup materials employed [summation of d)(2)d. for all HAPs], in pounds; and
 - f. the rolling 12-month individual HAP [i.e. from d)(2)d.] and combined HAPs [i.e. from d)(2)e.] emission rates, in tons.
- (3) The permit to install for this emissions unit group was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):
- Pollutant: Dipropylene Glycol Methyl Ether*
TLV (mg/m3): 606.13
Maximum Hourly Emission Rate (lbs/hr): 8.0
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 699
MAGLC (ug/m3): 14431.67
- *All emissions assumed to be Dipropylene Glycol Methyl Ether since it has the lowest TLV
- (4) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:



- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound* with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant* with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

* Only compounds / pollutants as identified in OAC rule 3745-114-01 at the time of the change will be subject to re-evaluation.

- (5) If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
- (6) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. 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:
 - i. all exceedances of the rolling 12-month individual HAP and combined HAPs emission limitations of 9.5 and 24 tons, respectively for emissions units K004, K005, K006, P005, and P006, combined;



- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. 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).

- (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 eBusiness 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 section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:
0.61 tons OC per month; 7.3 tons OC per year
(emissions units P005 and P006 combined)

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in d)(1).

- b. Emission Limitation:
9.5 tons per rolling 12-month period for any individual HAP; 24 tons per rolling 12-month period for any combination of HAPs
(for emissions units K004, K005, K006, P005, and P006, combined)

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in d)(2).

- (2) Formulation data, or USEPA Method 24 or 311, shall be used to determine the VOC /OC /HAP content of each coating /solvent material.

g) Miscellaneous Requirements

- (1) None.