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Facility Name: **Crestline Paint**

Application Number: **03-3046**

Date: **November 3, 1999**

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

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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.

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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.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Crestline Paint** located in **Richland** 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.

(Mod)

Ohio EPA Source Number	R003 (Mod)	R007 (Mod)	R009 (Mod)
R001 (Mod)	Cont'd		
	R006 (Mod)		
	R006 (Mod) Cont'd		
	R005 (Mod)		
		R008 (Mod)	
R003			R010

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	(Mod)			
R010 Cont'd	K001 (Mod) Cont'd	Source Identification <u>Description</u> Plastic Automotive Parts Spray Booth modification to lower potential-to-emit	Plastic Automotive Parts Spray Booth modification to change recordkeeping requirements and OC content restrictions	Plastic Automotive Parts Spray Booth modification to change recordkeeping requirements and OC content restrictions
R011		Plastic Automotive Parts Spray Booth modification to increase allowable emission rate	Plastic Automotive Parts Spray Booth modification to change recordkeeping requirements and OC content restrictions	Plastic Automotive Parts Spray Booth modification to change recordkeeping requirements
K001				Plastic Automotive Parts Spray Booth modification to

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Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
separate booth from an existing emission unit	Plastic Automotive Parts Spray Booth	BAT Determination	Compliance with terms and conditions in this permit, Ohio EPA Air Toxics Policy, and use of non-photochemically reactive materials	ally reactive materials
Plastic Automotive Parts Spray Booth	Metal Automotive Parts Spray Booth modification to change rule applicability	Compliance with terms and conditions in this permit, Ohio EPA Air Toxics Policy, and use of non-photochemically reactive materials	Compliance with terms and conditions in this permit, Ohio EPA Air Toxics Policy, and use of non-photochemic	Compliance with terms and conditions in this permit, Ohio EPA Air Toxics Policy, and use of non-photochemically reactive materials

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	Toxics Policy			
Compliance with terms and conditions in this permit, Ohio EPA Air Toxics Policy, and use of non-photochemically reactive materials		Compliance with terms and conditions in this permit, Ohio EPA Air Toxics Policy, and use of non-photochemically reactive materials	Applicable Federal & OAC Rules 3745-31-05	3745-21-07 (G) 3745-31-05
Compliance with terms and conditions in this permit, Ohio EPA Air Toxics Policy, and use of non-photochemically reactive materials	Compliance with terms and conditions in this permit, Ohio EPA Air Toxics Policy, and use of non-photochemically reactive materials	Compliance with terms and conditions in this permit, Ohio EPA Air Toxics Policy, and use of non-photochemically reactive materials	3745-21-07 (G) 3745-31-05	3745-21-07 (G) (2) 3745-31-05

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05				
	3745-21-07			Permit Allowable Mass Emissions and/or Control/Usage Requirements
3745-21-07	(G)	3745-21-07		0.84 lb OC/hr from application of coating materials
(G)	3745-31-05	(G) (2)	3745-21-09 (U) (1) (f)	
3745-31-05		3745-31-05		31.87 lbs OC/month application of cleanup materials
				3.87 TPY of OC from all coatings and cleanup materials
				(**)
	3745-21-07			5.34 lbs OC/hr from application of coating materials
	(G) (2)	3745-21-07		
3745-21-07	3745-31-05	(G) (2)		
(G)		3745-31-05		31.87 lbs OC/month application of cleanup materials
3745-31-				

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
23.59 TPY of OC from all coating s and cleanup material s	materials (*)	materials (**)	cleanup (**)	3.5 lbs VOC/gallon excluding water and exempt solvent from all coating materials
1.41 lbs OC/hr from applica tion of coating material s	2.29 lbs OC/hr from application of coating materials (* 31.87 lbs *) OC/month application of cleanup materials	1.05 lbs OC/hr, from application of coating materials 4.60 TPY of OC from coating materials (**)	3.33 lbs OC/hr, from application of coating materials 31.87 lbs OC/month application of cleanup materials	
31.87 lbs OC/mont h applica tion of cleanup material s	10.24 TPY of OC from all coatings and cleanup materials (**)	0.27 lb OC/hr, from application of coating materials 31.87 lbs OC/month application of cleanup materials	14.8 TPY of OC from all coatings and cleanup materials (**)	
6.36 TPY of OC from all coating s and cleanup	1.34 lbs OC/hr from application of coating materials 31.87 lbs OC/month application of cleanup materials	1.37 TPY of OC from all coatings and cleanup materials (*) 1.00 lbs OC/hr, from application of coating materials 31.87 lbs OC/month application of cleanup materials	1.10 lbs VOC/hr, from application of coating materials 31.87 lbs VOC/month application of cleanup materials	
	6.06 TPY of OC from all coatings and cleanup	4.58 TPY of OC from all coatings and	5.02 TPY of VOC from all coatings and cleanup materials	

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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* The emissions limitations based on this applicable rule are less stringent than the limitations established pursuant to OAC Rule 3745-21-07(G)(2).

** The requirements of OAC Rule 3745-21-07(G)(2) are not applicable as this emissions unit employs non-photochemically reactive materials as defined in OAC Rule 3745-21-01.

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SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
OC	80.73

- * This permit results in a 1.37 TPY increase in OC emissions over previous limits.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402.**

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 **Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402.**

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

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the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

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. General Information

1. Crestline Paint Company is proposing several modifications to existing paint spray booths and coating lines at the facility as well as the installation of two new booths. The following is a summary of all of the proposed modifications:

R001 - This emissions unit is no longer subject to OAC Rule 3745-21-07 (G)(2) as photochemically reactive materials are no longer employed. Company wishes potential-to-emit be lowered to reflect actual emissions.

R003 - This emissions unit is no longer subject to OAC Rule 3745-21-07 (G)(2) as photochemically reactive materials are no longer employed and requires an emission limit increase of 16.3 TPY.

R005 - This emissions unit is being modified in order to remove OC content restrictions which are no longer applicable as well as eliminate the daily recordkeeping requirement.

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- R006 - This emissions unit is being modified in order to remove OC content restrictions which are no longer applicable as well as eliminate the daily recordkeeping requirement.
- R007 - This emissions unit is being modified in order to remove OC content restrictions which are no longer applicable as well as eliminate the daily recordkeeping requirement.
- R008 - This emissions unit is being modified to remove the daily recordkeeping requirement.
- R009 - This emissions unit was originally permitted as a portion of R003, but is actually an independent spray booth.
- R010 - This booth is a new installation.
- R011 - This booth is a new installation.
- K001 - This emissions unit was originally permitted as a portion of R003, but is actually an independent spray booth. Additionally, this booth falls under the requirements of OAC Rule 3745-21-09 (U).

B. Applicable Emissions Limitations and/or Control Requirements

1. There are no additional emissions limitations or control requirements other than those listed in the air emissions summary.

C. Operational Restrictions

1. This permit allows the use of materials specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

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Emissions Unit	Pollutant	TLV (ug/m ³)	Emission Rate (lbs/hr)	1 hour max. conc. (ug/m ³)	MAGLC (ug/m ³)
R001	Toluene	188,000	0.84	52.41	4470.0
R003	MAK	233,000	5.34	356.2	5547.6
R005	Toluene	188,000	1.41	234.3	4470.0
R006	Isobutanol	152,000	2.29	89.95	3619.0
R007	MAK	233,000	1.34	52.64	5547.6
R008	Butoxyethanol	121,000	1.05	111.7	2880.9
R009	Methanol	262,000	0.27	17.98	6238.0
R010	Toluene	188,000	1.00	62.40	4470.0
R011	Toluene	188,000	3.33	222.1	4470.0
K001	Butoxyethanol	121,000	1.10	73.37	2880.9

* Note: These levels represent total emissions and not the incremental increases resulting from the modifications. Although the air toxics policy only requires the incremental increases be modeled, a demonstration of compliance with the air toxics policy at these levels is acceptable.

2. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or 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 specified in the above table;
 - b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
 - c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
 - d. changes in the composition of the materials, or use of new materials, that would result in an increase in

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emissions of any pollutant that has a listed TLV.

3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
 - a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
 - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

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

4. The permittee shall use only use coatings which comply with the applicable emission limitations in OAC Rule 3745-21-09 (U) (1) (f) in emissions unit K001 on an "as applied" basis.
5. All coatings employed in emissions unit K001 shall not be dried at temperatures exceeding 200 degrees Fahrenheit.
6. The permittee shall only employ coating and cleanup materials in emissions units R001, R003, R006, R007, R008, R010, and R011 which are not photochemically reactive. "Photochemically reactive" is defined in OAC Rule 3745-21-01.

D. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions unit K001:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content of each coating (excluding water and exempt solvents), as applied.

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2. The permittee shall collect and record monthly the following information for emissions units K001 for the purpose of determining annual VOC emissions from this emissions unit:
 - a. The name and identification of each coating/cleanup material employed.
 - b. The VOC content of each coating/cleanup material, in pounds per gallon as applied.
 - c. The number of gallons of each coating/cleanup material employed.
 - d. The VOC emission rate from each coating/cleanup material employed [c x d]
 - e. The total VOC emission rate from all coatings and cleanup materials employed, in pounds or tons per month [sum of (e)].
 - f. The total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per year, for the calendar year-to-date.

3. The permittee shall collect and record monthly the following information for emissions units R001, R003, R005, R006, R007, R008, R009, R010, R011 for the purpose of determining annual OC emissions from this emissions unit:
 - a. The name and identification of each coating/cleanup material employed.
 - b. A determination of whether or not the coating/cleanup material is photochemically reactive.
 - c. The OC content of each coating/cleanup material, in pounds per gallon, as applied.
 - d. The number of gallons of each coating/cleanup material employed.
 - e. The OC emission rate from each coating/cleanup material employed [c x d]
 - f. The total OC emission rate from all coatings and

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cleanup materials employed, in pounds or tons per month [sum of (e)].

- g. The total OC emissions from all coatings and cleanup materials employed, in pounds or tons per year, for the calendar year-to-date.
4. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings, if a strip-chart recorder is employed, for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

E. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings in emissions unit K001. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly written reports for emissions units R001, R003, R005, R006, R007, R008, R009, R010, R011, and K001 of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from

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malfunctions reported in accordance with OAC rule 3745-15-06.)

F. Testing Requirements

1. Compliance with the emission limitation(s) in the Applicable Emission Limitations and/or Control Requirements of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitations:

R001:	Coatings: 0.84 lb OC/hr
	Cleanup Material: 31.87 lbs/month
R003:	Coatings: 5.34 lbs OC/hr
	Cleanup Material: 31.87 lbs/month
R005:	Coatings: 1.41 lbs OC/hr
	Cleanup Material: 31.87 lbs/month
R006:	Coatings: 2.29 lbs OC/hr
	Cleanup Material: 31.87 lbs/month
R007:	Coatings: 1.34 lbs OC/hr
	Cleanup Material: 31.87 lbs/month
R008:	Coatings: 1.05 lbs OC/hr
R009:	Coatings: 0.27 lbs OC/hr
	Cleanup Material: 31.87 lbs/month
R010:	Coatings: 1.00 lbs OC/hr
	Cleanup Material: 31.87 lbs/month
R011:	Coatings: 3.33 lbs OC/hr
	Cleanup Material: 31.87 lbs/month
K001:	Coatings: 1.10 lbs VOC/hr
	Cleanup Material: 31.87 lbs/month

Applicable Compliance Method:

These hourly VOC/OC limits for coatings and monthly VOC/OC limits for cleanup operations are based on each emission unit's potential to emit. Therefore, no daily recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limits. The potential to emit for each emissions unit is based on maximum VOC/OC

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content and maximum usage rates.

b. Emission Limitations:

R001:	3.87 tons OC/year
R003:	23.59 tons OC/year
R005:	6.36 tons OC/year
R006:	10.24 tons OC/year
R007:	6.06 tons OC/year
R008:	4.60 tons OC/year
R009:	1.37 tons OC/year
R010:	4.58 tons OC/year
R011:	14.8 tons OC/year
K001:	5.02 tons VOC/year

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Applicable Compliance Method:

The recordkeeping requirements in the Monitoring and/or Recordkeeping section of this permit shall be used to determine compliance with the above limits.

2. Emission Limitations:

K001: 3.5 lbs VOC/gallon excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in section C.2. of this permit. Formulation data or USEPA method 24 may be used to determine the VOC content of the coatings.

G. Miscellaneous Requirements

1. The preceding requirements shall supersede all the requirements contained in the following Permits-to-Install: 03-5526, 03-9216 and 03-9310.