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Facility Name: **Lear Corporation**

Application Number: **03-3055**

Date: **October 28, 1998**

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.

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

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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 **Lear Corporation** located in **Erie** 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 & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
				3745-21-07 (G) (9) (c)
R001 (mod)	coating spray booth and flash-off area for plastic automotive parts: modification to establish lower limitations due to coating reformulations	not applicable	3745-31-02 (A) (2)	3745-17-11 (B) 3745-17-07 (A)

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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>
	0 percent opacity, as a six-minute average			
Permit Allowable Mass Emissions and/or Control/Usage Requirements	<u>cleanup usage:</u> 60.9 pounds OC/month, 0.40 ton OC/year			
<u>coating usage:</u> 12.7 pounds OC/hour, 55.7 tons OC/year	no emission limitation established per exemption			
0.66 pound particulate emissions (PE)/hour, 2.89 tons PE/year				
visible PE shall not exceed				

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- * The emissions limitations established under this applicable rule are less stringent than those established pursuant to OAC rule 3745-31-02(A)(2).

SUMMARY
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
OC	56.1
PE	2.89

- * The decrease in the allowable OC emissions as a result of this PTI is 11.1 tons/year. Particulate emissions were not addressed in prior permits.

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, Ohio 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)

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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, Ohio 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 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

INTRODUCTION: Prior to the issuance of this PTI, LEAR Corporation was subject to the requirements of Title V of the Clean Air Act, as amended. The company has shutdown one coating operation (R002) and has changed the coatings from solvent-based to water-based in the one remaining coating operation (R001). The purpose of this PTI is to document this emissions decrease, at the permittee's request pursuant to OAC rule 3745-31-02(A)(2).

A. APPLICABLE EMISSION LIMITATIONS AND/OR CONTROL REQUIREMENTS

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No additional emission limitations and/or control requirements other than those identified in the Air Emission Summary section of this permit.

B. OPERATIONAL RESTRICTIONS

1. The permittee shall only employ coating materials in this emissions unit which comply with the requirements of OAC rule 3745-21-07(G)(9)(c) on an "as applied" basis.
2. The permittee shall operate the exhaust filters whenever this emissions unit is in operation.
3. This permit allows for the use of the coatings and cleanup materials specified by the permittee in PTI application number 03-13055. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the OC emission limitations specified in this permit were established in accordance with Ohio EPA's "Air Toxics Policy" and are based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Dispersion modeling (using the Screen 3 model) was not required to be conducted as the increase in emissions was less than 1 ton OC/year.

Any of the following changes may be deemed a "modification" to the emissions unit and, as such, prior notification to and approval from the Ohio EPA Northwest District Office are required:

- a. any change in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup 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. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate,

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reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;

- c. any change to the emissions unit or its method of operation that would either 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; and,
- d. any change in the composition of the coatings or cleanup materials that would increase the content of "Hazardous Air Pollutants" (HAPs) as defined in OAC 3745-77-01 (V).

C. MONITORING AND/OR RECORDKEEPING REQUIREMENTS

- 1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification number of each coating, as applied;
 - b. a determination that each coating, as applied, is not a photochemically reactive material and complies with the requirements of OAC rule 3745-21-07(G)(9)(c);
 - c. the amount of each coating material employed (in gallons);
 - d. the OC content of each coating material, as applied (in pounds/gallon);
 - e. the OC emissions from each coating material employed (in pounds or tons) [c x d]; and,
 - f. the total OC emissions from all coating materials employed (in pounds or tons) [the sum of e].
- 2. The permittee shall collect and record the following information each month for this emissions unit
 - a. the name and identification of each cleanup

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- material employed;
- b. a determination that each cleanup material is not photochemically reactive;
 - c. the OC content of each cleanup material (in pounds/gallon);
 - d. the amount of each cleanup material employed (in gallons);
 - e. the OC emissions from each cleanup material employed (in pounds or tons) [c x d]; and,
 - f. the total OC emissions from all cleanup materials employed (in pounds or tons) [the sum of e].
3. The permittee shall maintain daily records that document any time periods when the exhaust filters were not in service when the emissions unit was in operation.
 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.

D. REPORTING REQUIREMENTS

1. The permittee shall notify the Director (Ohio EPA Northwest District Office) in writing of any daily record showing that the exhaust filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northwest District Office) within 30 days after the event occurs.
2. The permittee shall submit annual written reports of

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(i) any deviations (excursions) 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, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA Northwest District Office. If no deviations occurred during a calendar year, an annual report shall be submitted which states that no deviations occurred during that reporting period. The reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

Reports of any required information shall be submitted to the Ohio EPA Northwest District Office.

E. TESTING REQUIREMENTS/COMPLIANCE METHODS DETERMINATION

1. Compliance Methods Requirements: Compliance with the emission limitation(s) established in this permit shall be determined in accordance with the following method(s):

a. Emission Limitation: 12.7 pounds OC/hour, 55.7 tons OC/year from coating material usage

Applicable Compliance Method: The hourly OC emission limitation is based on the emissions unit's potential to emit. Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation. The permittee may demonstrate compliance with the annual OC emission limitation of 55.7 tons through the recordkeeping required in section C.1 of the terms and conditions of this permit.

b. Emission Limitation: 60.9 pounds OC/month, 0.40 ton OC/year from cleanup material usage

Applicable Compliance Method: The permittee may demonstrate compliance with the monthly and annual OC emission limitations through the recordkeeping

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required in section C.2 of the terms and conditions of this permit.

- c. Emission Limitation: 0.66 pound PE/hour, 2.89 tons PE/year **from coating material usage**

Applicable Compliance Method: The permittee may calculate actual PE rate from the unit utilizing the following equation:

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

where:

E = Particulate emissions rate (pounds/hour).

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

CE = Control efficiency of the control equipment (filters).

If required, compliance with the PE limitation shall be determined in accordance with the test methods and procedures in USEPA Method 5, which is located in 40 CFR Part 60, Appendix A.

- d. Emission Limitation: visible PE from emissions unit R001 shall not exceed 0 percent opacity, as a six-minute average

Applicable Compliance Method: The permittee may demonstrate compliance with the visible emission limitation through the operational restriction, monitoring/recordkeeping and reporting requirements in sections B.2, C.3 and D.2 of the terms and conditions of this permit.

NOTE: No term or condition specifying a method for demonstrating compliance with any emission limitation or other requirement of this permit shall preclude the use by any person of any credible evidence to establish compliance with or a violation of this permit, the

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Clean Air Act, or any implementing regulations or rules promulgated thereunder.

F. MISCELLANEOUS REQUIREMENTS

1. The terms and conditions of this permit shall supersede all of the air pollution control requirements contained in the Permit to Install application number 03-7850 issued for this emissions unit on June 8, 1995.