☒ **Synthetic Minor Determination and/or** ☐ **Netting Determination**

Permit To Install **08-04651**

## A. Source Description

The Mechanical Products Division of Lord Corporation produces bonded elastomer assemblies, active systems and controllable devices to manage shock, vibration, noise and motion in helicopters. The PTI application is for 4 coating process and tension torsion strap room. They are requesting federally enforceable limits on their HAP emissions to limit their facility wide HAP emissions below the Title V threshold of 10 tons per year for an individual HAP and 25 tons per year for any combination of HAPs. The following sources contribute to Lord's facility wide emissions:

| | | | | | Potential (TPY) | | | Allowables (TPY) | | |
|---|---|---|---|---|---|---|---|---|---|---|
| ID | Description | PTI | Applicable Reg. | Issued | VOC | Ind. HAP | Total HAP | VOC | Ind. HAP | Total HAP |
| B001 | 4.1MMBtu/Hr Natural Gas-Fired Boiler | 08-2013 | | 3/10/99 | 0.20 | NA | NA | | | |
| K001 | Manual Adhesive Spray Booth | 08-4651 | 21-09(U)(2)(e)(i | | 11.74 | 8.75 | 11.74 | 11.74 | | |
| K002 | Automatic Adhesive Spray Booth | 08-4651 | 21-09(U)(2)(e)(i ) | | 11.74 | 8.75 | 11.74 | 11.74 | | |
| K003 | Assembly Spray Booth | 08-4651 | 21-09(U)(2)(e)(i | | 11.74 | 8.75 | 11.74 | 11.74 | | |
| K008 | Manual Adhesive Spray Booth | 08-4651 | 21-09(U)(2)(e)(i | | 11.74 | 8.75 | 11.74 | 11.74 | | |
| R001 | Tension Torsion Strap Room | 08-4651 | 21-07(G)(2) | | 7.30 | 7.30 | 7.30 | 7.30 | | |
| P001 | Grinders and Welders w/ Fabric Filter | 08-676 | | 10/17/84 | Particulate Emissions Only | | | | | |
| P002 | Metal Finishing Line | 08-3446 | 17-07, 17-11 | 12/13/95 | NA | 6.43 | 6.43 | | | |
| P003 | Hand-Cranked Mixer and Dispensing Pump | 08-2013 | 21-07(G)(2) | 3/10/99 | 7.30 | 0.21 | 0.23 | 0.32 | | |
| P004 | Elastomer Preheating Ovens and Curing Process (4 ea.) | 08-2013 | 21-07(G)(2) | 3/10/99 | 7.30 | NA | NA | 2.10 | | |
| | | | | | 69.06 | 48.94 | 60.92 | 56.7 | 9.9 | 24.9 |

## B. Facility Emissions and Attainment Status

Lord is located in Dayton, Montgomery County, which is in attainment for all criteria pollutants except ozone. Lord has 10 emission units, of which 5 are included in this PTI application to request federally enforceable limitations and 5 are on registration status. The current facility wide total HAP potential to emit (PTE) is 60.92 TPY and the individual HAP PTE is 48.94 for all emission units including those on registration status.

## C. Source Emissions

Uncontrolled potential to emit from K001, K002, K003, K008 and R001 are 54.26 for total HAPs and 42.30 for an individual HAP. This permit will be issued in draft and will have facility wide federally enforceable rolling, 12-month limitations of 24.9 for total HAP and 9.9 for any individual HAP.

## D. Conclusion

A PTI is recommended for these emission units. Federal enforceability of the synthetic minor limitations will be achieved through record keeping of monthly and 12-month rolling emissions.

State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL** **CERTIFIED MAIL**
**MONTGOMERY COUNTY**

Street Address: Mailing Address:
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329 Lazarus Gov. Center

**Application No:** 08-04651
**Fac ID:** 0857731802

**DATE:** 2/3/2005

Lord Corp
Robert Fortner
4644 Wadsworth Rd
Dayton, OH 454144294

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **$1000** will be due. Please do not submit any payment now.

The Ohio EPA is urging 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 Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

**CC: USEPA RAPCA Miami Valley Regional Planning Commission KY IN**

**MONTGOMERY COUNTY**

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **08-04651** FOR AN AIR CONTAMINANT SOURCE FOR
**Lord Corp**

On 2/3/2005 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Lord Corp**, located at **4644 Wadsworth Rd, Dayton**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 08-04651:

**ch 31 mod replacing 08-3460 issued 1/31/96,08-4513 issued 6/19/03,08-2013 issued 3/10/99,08-3446 issued 12/13/95,08-4496 issued 9/4/03 to give them federally enforcable limits.**

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

John Paul, Regional Air Pollution Control Agency, 117 South Main Street, Dayton, OH 45422-1280
[(937)225-4435]

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install** | **Issue Date: To be entered upon final issuance**
**Terms and Conditions** | **Effective Date: To be entered upon final issuance**

**DRAFT PERMIT TO INSTALL 08-04651**

| | |
|---|---|
| Application Number: | 08-04651 |
| Facility ID: | 0857731802 |
| Permit Fee: | **To be entered upon final issuance** |
| Name of Facility: | Lord Corp |
| Person to Contact: | Robert Fortner |
| Address: | 4644 Wadsworth Rd<br>Dayton, OH 454144294 |

Location of proposed air contaminant source(s) [emissions unit(s)]:
**4644 Wadsworth Rd**
**Dayton, Ohio**

Description of proposed emissions unit(s):
**ch 31 mod replacing 08-3460 issued 1/31/96,08-4513 issued 6/19/03,08-2013 issued 3/10/99,08-3446 issued 12/13/95,08-4496 issued 9/4/03 to give them federally enforcable limits.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(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 and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

## A. Permit to Install General Terms and Conditions

### 1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

### 2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports 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 malfunctions reported in accordance with OAC rule 3745-15-06.)

### 3. Records Retention Requirements

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 for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

### 4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any

information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**6. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**7. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

**9. Construction of New Sources(s)**

The proposed emissions unit(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 cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(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 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 the requirements of this permit or cannot meet applicable standards.

**10. 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.

**11. Applicability**

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

**12. 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.

**13. Source Operation and Operating Permit Requirements 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, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

**14. 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.

**15. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

## B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

### SUMMARY (for informational purposes only)
### TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

| Pollutant | Tons Per Year |
|---|---|
| VOC | 54.26 |
| Individual HAP | 9.9 |
| Total HAP | 24.9 |

Emissions Unit ID: **K001**

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| K001 - Manual Adhesive Spray Booth<br><br>*Modification | OAC rule 3745-31-05(A)(3) | The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 64.3 pounds per day (lbs/day), excluding cleanup<br><br>The VOC emissions from this emissions unit shall not exceed 11.74 tons per year (TPY), including cleanup<br><br>The requirement of this rule shall also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(i) and OAC rule 3745-35-07(B). |
| | OAC rule 3745-21-09(U)(2)(e)(i) | The maximum daily coating usage rate shall not exceed 8 gallons. |
| | OAC rule 3745-35-07(B)<br>(Synthetic Minor to avoid Title V) | Combined emissions from all emission units at the facility shall not exceed 9.9 tons of any individual hazardous air pollutant (HAP), as a rolling, 12-month summation.<br><br>Combined emissions from all emission units at the facility shall not exceed |

24.9 tons of all HAPs, as a rolling,
12-month summation.

**2. Additional Terms and Conditions**

**2.a** The 64.3 lbs VOC/day emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

**B. Operational Restrictions**

None

**C. 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 volume, in gallons, of each coating employed.

   c. The total volume, in gallons, of all of the coatings employed.

2. The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

   a. The name and identification number of each coating employed.

   b. The volume, in gallons, of each coating employed.

   c. The VOC content of each coating, as applied, in pounds per gallon.

   d. The name and identification of each cleanup material employed.

   e. The number of gallons of each cleanup material employed.

   f. The number of gallons of each cleanup material drummed for shipment off site.

   g. The VOC content of each cleanup material, in pounds per gallon.

h. The total VOC emissions from all coatings and cleanup materials employed, in tons (i.e., the summation of the products of C.2.b. X C.2.c. for each coating material plus the sum of the products of [(C.2.e.-C.2.f.) X C.2.g.] for each cleanup material.

3. The permittee shall collect and record the following information each month for the entire facility (including, but not limited to emission units K001, K002, K003, K008 and R001):

a. The name and identification number of each coating employed.

b. The individual HAP content for each HAP of each coating material, in pounds of individual HAP per gallon, as applied.

c. The total combined HAP content of each coating material, in pounds of combined HAPs per gallon, as applied (the sum of all the individual HAP contents from C.3.b.).

d. The number of gallons of each coating employed.

e. The name and identification of cleanup material employed..

f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of material, as applied.

g. The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (the sum of all the individual HAP contents from C.3.f.).

h. The number of gallons of each cleanup material employed.

i. The number of gallons of cleanup material recovered for disposal.

j. The total individual HAP emission rate, in pounds or tons per rolling, 12-month period, for each HAP (i.e., for each HAP, the sum of products of C.3.b. X C.3.d. for each coating material plus the sum of the products of [C.3.f. X (C.3.h.-C.3.i.)] for each cleanup material).

k. The total combined HAP emission rate, in pounds or tons per rolling, 12-month period, for all HAPs employed (i.e., the sum of the products of C.3.c. X C.3.d. for each coating material plus the sum of the products of [C.3.g. X (C.3.h. - C.3.i.)] for each cleanup material).

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local agency contact. This information does nor have to be kept on a line-by-line basis.

4. The permit to install for this emissions unit K001 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, for K001, K002, K003, K008 and R001. 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: | Methyl Isobutyl Ketone |
| TLV (mg/m3): | 205 |
| Maximum Hourly Emission Rate (lbs/hr): | 5.99 |
| Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): | 4,702 |
| MAGLC (ug/m3): | 4,877 |
| Pollutant: | Xylene |
| TLV (mg/m3): | 434 |
| Maximum Hourly Emission Rate (lbs/hr): | 5.37 |
| Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): | 4,213 |
| MAGLC (ug/m3): | 10,338 |
| Pollutant: | Toluene |
| TLV (mg/m3): | 188 |

| | |
|---|---|
| Maximum Hourly Emission Rate (lbs/hr): | 5.33 |
| Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): | 4,182 |
| MAGLC (ug/m3): | 4,486 |
| Pollutant: | Tetrachloroethylene |
| TLV (mg/m3): | 170 |
| Maximum Hourly Emission Rate (lbs/hr): | 1.83 |
| Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): | 1436 |
| MAGLC (ug/m3): | 4036 |
| Pollutant: | Ethylbenzene |
| TLV (mg/m3): | 434 |
| Maximum Hourly Emission Rate (lbs/hr): | 1.53 |
| Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): | 1,204 |
| MAGLC (ug/m3): | 10,338 |

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 still 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.

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.).

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

5. 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".

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.

## D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. 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 45 days after the exceedance occurs.

2. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

3. The permittee shall submit annual reports that specify the individual and/or combined HAP emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

4. The permittee shall submit quarterly deviation (excursion) reports that include the following:

   a. An identification of each month during which the rolling, 12-month individual facility HAP emission rate exceeded the 9.9 TPY rolling, 12-month individual facility HAP emission limitation, and the actual rolling, 12-month individual facility HAP emission rate for each such month.

   b. An identification of each month during which the rolling, 12-month combined facility HAP emission rate exceeded the 24.9 TPY rolling, 12-month combined facility HAP emission limitation, and the actual rolling, 12-month combined facility HAP emission rate for each such month.

5. These quarterly deviation reports (excursion) reports shall be submitted to the Ohio EPA Central District Office or local air agency by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

## E. Testing Requirements

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:

   a. Emission Limitation -
   64.3 lbs VOC/day, excluding cleanup

   Applicable Compliance Method -
   Compliance shall be determined by multiplying the maximum daily coating rate (8 gals ctg) by the maximum VOC content (8.04 lbs VOC/gal ctg).

   b. Emission Limitation -
   11.74 tons VOC/yr, including cleanup

   Applicable Compliance Method -
   Compliance shall be based upon the record keeping requirements specified in Section C.2. of this permit and shall be the summation of the 12 monthly VOC emission rates divided

by 2000 lbs/ton.

c. Emission Limitation -
Less than or equal to 8 gallons coating per day

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section C.1. of this permit.

d. Emission Limitation-
9.9 TPY of an individual HAP, based on a 12-month rolling summation

Applicable Compliance Method
Compliance shall be based upon the record keeping requirements specified in Section C.3. of this permit.

e. Emission Limitation-
24.9 TPY of any combination of HAPs, based on a 12-month rolling summation

Applicable Compliance Method
Compliance shall be based upon the record keeping requirements specified in Section C.3, of this permit.

## F. Miscellaneous Requirements

1. Chapter 31 modification to 08-03460, issued January 31, 1996, to include federally enforceable facility wide emission limitations for HAPs and represents an increase in the VOC allowable emission rate of 2.24 TPY VOC.

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| K002 - Automatic Adhesive Spray Booth<br><br>*Modification | OAC rule 3745-31-05(A)(3) | The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 64.3 pounds per day (lbs/day), excluding cleanup<br><br>The VOC emissions from this emissions unit shall not exceed 11.74 tons per year (TPT), including cleanup<br><br>The requirement of this rule shall also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(i). |
| | OAC rule 3745-21-09(U)(2)(e)(i) | The maximum daily coating usage rate shall not exceed 8 gallons. |
| | OAC rule 3745-35-07(B) (Synthetic Minor to avoid Title V) | Combined emissions from all emission units at the facility shall not exceed 9.9 tons of any individual hazardous air pollutant (HAP), as a rolling, 12-month summation.<br><br>Combined emissions from all emission units at the facility shall not exceed 24.9 tons of all HAPs, as a rolling, |

12-month summation.

**2. Additional Terms and Conditions**

**2.a** The 64.3 lbs VOC/day emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

## B. Operational Restrictions

None

## C. 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 volume, in gallons, of each coating employed.

   c. The total volume, in gallons, of all of the coatings employed.

2. The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

   a. The name and identification number of each coating employed.

   b. The volume, in gallons, of each coating employed.

   c. The VOC content of each coating, as applied, in pounds per gallon.

   d. The name and identification of each cleanup material employed.

   e. The number of gallons of each cleanup material employed.

   f. The number of gallons of each cleanup material drummed for shipment off site.

   g. The VOC content of each cleanup material, in pounds per gallon.

   h. The total VOC emissions from all coatings and cleanup materials employed, in tons (i.e., the summation of the products of C.2.b. X C.2.c. for each coating material plus the sum of the products of [(C.2.e.-C.2.f.) X C.2.g.] for each cleanup material.

3. The permittee shall collect and record the following information each month for the entire facility (including, but not limited to emission units K001, K002, K003, K008 and R001):

   a. The name and identification number of each coating employed.

   b. The individual HAP content for each HAP of each coating material, in pounds of individual HAP per gallon, as applied.

   c. The total combined HAP content of each coating material, in pounds of combined HAPs per gallon, as applied (the sum of all the individual HAP contents from C.3.b.).

   d. The number of gallons of each coating employed.

   e. The name and identification of cleanup material employed..

   f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of material, as applied.

   g. The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (the sum of all the individual HAP contents from C.3.f.).

   h. The number of gallons of each cleanup material employed.

   i. The number of gallons of cleanup material recovered for disposal.

   j. The total individual HAP emission rate, in pounds or tons per rolling, 12-month period, for each HAP (i.e., for each HAP, the sum of products of C.3.b. X C.3.d. for each coating material plus the sum of the products of [C.3.f. X (C.3.h.-C.3.i.)] for each cleanup material).

   k. The total combined HAP emission rate, in pounds or tons per rolling, 12-month period, for all HAPs employed (i.e., the sum of the products of C.3.c. X C.3.d. for each coating material plus the sum of the products of [C.3.g. X (C.3.h. - C.3.i.)] for each cleanup material).

   * A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local agency contact. This information does nor have to be kept on a line-by-line basis.

4. The permit to install for this emissions unit K002 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, for K001, K002, K003, K008 and R001. 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: | Methyl Isobutyl Ketone |
| TLV (mg/m3): | 205 |
| Maximum Hourly Emission Rate (lbs/hr): | 5.99 |
| Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): | 4,702 |
| MAGLC (ug/m3): | 4,877 |
| Pollutant: | Xylene |
| TLV (mg/m3): | 434 |
| Maximum Hourly Emission Rate (lbs/hr): | 5.37 |
| Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): | 4,213 |
| MAGLC (ug/m3): | 10,338 |
| Pollutant: | Toluene |
| TLV (mg/m3): | 188 |
| Maximum Hourly Emission Rate (lbs/hr): | 5.33 |
| Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): | 4,182 |

| | |
|---|---|
| MAGLC (ug/m3): | 4,486 |
| Pollutant: | Tetrachloroethylene |
| TLV (mg/m3): | 170 |
| Maximum Hourly Emission Rate (lbs/hr): | 1.83 |
| Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): | 1,436 |
| MAGLC (ug/m3): | 4,036 |
| Pollutant: | Ethylbenzene |
| TLV (mg/m3): | 434 |
| Maximum Hourly Emission Rate (lbs/hr): | 1.53 |
| Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): | 1,204 |
| MAGLC (ug/m3): | 10,338 |

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 still 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.

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.).

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

5. 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".

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.

**D. Reporting Requirements**

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. 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 45 days after the exceedance occurs.

2. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

3. The permittee shall submit annual reports that specify the individual and/or combined HAP emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

4. The permittee shall submit quarterly deviation (excursion) reports that include the following:

   a. An identification of each month during which the rolling, 12-month individual facility HAP emission rate exceeded the 9.9 TPY rolling, 12-month individual facility HAP emission limitation, and the actual rolling, 12-month individual facility HAP emission rate for each such month.

   b. An identification of each month during which the rolling, 12-month combined facility HAP emission rate exceeded the 24.9 TPY rolling, 12-month combined facility HAP emission limitation, and the actual rolling, 12-month combined facility HAP emission rate for each such month.

5. These quarterly deviation reports (excursion) reports shall be submitted to the Ohio EPA Central District Office or local air agency by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

## E. Testing Requirements

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:

   a. Emission Limitation -
   64.3 lbs VOC/day, excluding cleanup

   Applicable Compliance Method -
   Compliance shall be determined by multiplying the maximum daily coating rate (8 gals ctg) by the maximum VOC content (8.04 lbs VOC/gal ctg).

   b. Emission Limitation -
   11.74 tons VOC/yr, including cleanup

   Applicable Compliance Method -
   Compliance shall be based upon the record keeping requirements specified in Section C.2. of this permit and shall be the summation of the 12 monthly VOC emission rates divided by 2000 lbs/ton.

   c. Emission Limitation -
   Less than or equal to 8 gallons coating per day

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section C.1. of this permit.

d. Emission Limitation-
9.9 TPY of an individual HAP, based on a 12-month rolling summation

Applicable Compliance Method
Compliance shall be based upon the record keeping requirements specified in Section C.3. of this permit.

e. Emission Limitation-
24.9 TPY of any combination of HAPs, based on a 12-month rolling summation

Applicable Compliance Method
Compliance shall be based upon the record keeping requirements specified in Section C.3, of this permit.

**F. Miscellaneous Requirements**

1. Chapter 31 modification to 08-04513, issued June 19, 2003, to include federally enforceable facility wide emission limitations for HAPs.

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| K003 - Assembly Spray Booth<br><br>*Modification | OAC rule 3745-31-05(A)(3) | The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 64.3 pounds per day (lbs/day), excluding cleanup<br><br>The VOC emissions from this emissions unit shall not exceed 11.74 tons per year (TPY), including cleanup<br><br>The requirement of this rule shall also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(i) and OAC rule 3745-35-07(B). |
| | OAC rule 3745-21-09(U)(2)(e)(i) | The maximum daily coating usage rate shall not exceed 8 gallons. |
| | OAC rule 3745-35-07(B) (Synthetic Minor to avoid Title V) | Combined emissions from all emission units at the facility shall not exceed 9.9 tons of any individual hazardous air pollutant (HAP), as a rolling, 12-month summation.<br><br>Combined emissions from all emission units at the facility shall not exceed |

24.9 tons of all HAPs, as a rolling, 12-month summation.

**2. Additional Terms and Conditions**

**2.a** The 64.3 lbs VOC/day emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

**B. Operational Restrictions**

None

**C. 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 volume, in gallons, of each coating employed.

   c. The total volume, in gallons, of all of the coatings employed.

2. The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

   a. The name and identification number of each coating employed.

   b. The volume, in gallons, of each coating employed.

   c. The VOC content of each coating, as applied, in pounds per gallon.

   d. The name and identification of each cleanup material employed.

   e. The number of gallons of each cleanup material employed.

   f. The number of gallons of each cleanup material drummed for shipment off site.

   g. The VOC content of each cleanup material, in pounds per gallon.

   h. The total VOC emissions from all coatings and cleanup materials employed, in tons (i.e.,

the summation of the products of C.2.b. X C.2.c. for each coating material plus the sum of the products of [(C.2.e.-C.2.f.) X C.2.g.] for each cleanup material.

3. The permittee shall collect and record the following information each month for the entire facility (including, but not limited to emission units K001, K002, K003, K008 and R001):

   a. The name and identification number of each coating employed.

   b. The individual HAP content for each HAP of each coating material, in pounds of individual HAP per gallon, as applied.

   c. The total combined HAP content of each coating material, in pounds of combined HAPs per gallon, as applied (the sum of all the individual HAP contents from C.3.b.).

   d. The number of gallons of each coating employed.

   e. The name and identification of cleanup material employed..

   f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of material, as applied.

   g. The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (the sum of all the individual HAP contents from C.3.f.).

   h. The number of gallons of each cleanup material employed.

   i. The number of gallons of cleanup material recovered for disposal.

   j. The total individual HAP emission rate, in pounds or tons per rolling, 12-month period, for each HAP (i.e., for each HAP, the sum of products of C.3.b. X C.3.d. for each coating material plus the sum of the products of [C.3.f. X (C.3.h.-C.3.i.)] for each cleanup material).

   k. The total combined HAP emission rate, in pounds or tons per rolling, 12-month period, for all HAPs employed (i.e., the sum of the products of C.3.c. X C.3.d. for each coating material plus the sum of the products of [C.3.g. X (C.3.h. - C.3.i.)] for each cleanup material).

   * A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local agency contact. This

information does nor have to be kept on a line-by-line basis.

4. The permit to install for this emissions unit K003 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, for K001, K002, K003, K008 and R001. 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: | Methyl Isobutyl Ketone |
| TLV (mg/m3): 205 | |
| Maximum Hourly Emission Rate (lbs/hr): | 5.99 |
| Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): | 4,702 |
| MAGLC (ug/m3): | 4,877 |
| Pollutant: | Xylene |
| TLV (mg/m3): | 434 |
| Maximum Hourly Emission Rate (lbs/hr): | 5.37 |
| Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): | 4,213 |
| MAGLC (ug/m3): | 10,338 |
| Pollutant: | Toluene |
| TLV (mg/m3): | 188 |
| Maximum Hourly Emission Rate (lbs/hr): | 5.33 |

| | |
|---|---|
| Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): | 4,182 |
| MAGLC (ug/m3): | 4,486 |
| Pollutant: | Tetrachloroethylene |
| TLV (mg/m3): | 170 |
| Maximum Hourly Emission Rate (lbs/hr): | 1.83 |
| Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): | 1,436 |
| MAGLC (ug/m3): | 4,036 |
| Pollutant: | Ethylbenzene |
| TLV (mg/m3): | 434 |
| Maximum Hourly Emission Rate (lbs/hr): | 1.53 |
| Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): | 1,204 |
| MAGLC (ug/m3): | 10,338 |

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 still 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.

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.).

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

5. 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".

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

## D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. 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 45 days after the exceedance occurs.

2. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

3. The permittee shall submit annual reports that specify the individual and/or combined HAP emissions from this emissions unit for the previous calendar year. These reports shall be

submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

4. The permittee shall submit quarterly deviation (excursion) reports that include the following:

   a. An identification of each month during which the rolling, 12-month individual facility HAP emission rate exceeded the 9.9 TPY rolling, 12-month individual facility HAP emission limitation, and the actual rolling, 12-month individual facility HAP emission rate for each such month.

   b. An identification of each month during which the rolling, 12-month combined facility HAP emission rate exceeded the 24.9 TPY rolling, 12-month combined facility HAP emission limitation, and the actual rolling, 12-month combined facility HAP emission rate for each such month.

5. These quarterly deviation reports (excursion) reports shall be submitted to the Ohio EPA Central District Office or local air agency by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

## E. Testing Requirements

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:

   a. Emission Limitation -
   64.3 lbs VOC/day, excluding cleanup

   Applicable Compliance Method -
   Compliance shall be determined by multiplying the maximum daily coating rate (8 gals ctg) by the maximum VOC content (8.04 lbs VOC/gal ctg).

   b. Emission Limitation -
   11.74 tons VOC/yr, including cleanup

   Applicable Compliance Method -
   Compliance shall be based upon the record keeping requirements specified in Section C.2. of this permit and shall be the summation of the 12 monthly VOC emission rates divided by 2000 lbs/ton.

c. Emission Limitation -
Less than or equal to 8 gallons coating per day

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section C.1. of this permit.

d. Emission Limitation-
9.9 TPY of an individual HAP, based on a 12-month rolling summation

Applicable Compliance Method
Compliance shall be based upon the record keeping requirements specified in Section C.3. of this permit.

e. Emission Limitation-
24.9 TPY of any combination of HAPs, based on a 12-month rolling summation

Applicable Compliance Method
Compliance shall be based upon the record keeping requirements specified in Section C.3, of this permit.

**F. Miscellaneous Requirements**

1. Chapter 31 modification to 08-03460, issued January 31, 1996, to include federally enforceable facility wide emission limitations for HAPs and represents an increase in the VOC allowable emission rate of 10.62 TPY VOC.

Emissions Unit ID: **K008**

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| K008 - Manual Adhesive Spray Booth<br><br>*Modification | OAC rule 3745-31-05(A)(3) | The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 64.3 pounds per day (lbs/day), excluding cleanup<br><br>The VOC emissions from this emissions unit shall not exceed 11.74 tons per year (TPY), including cleanup<br><br>The requirement of this rule shall also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(i) and OAC rule 3745-35-07(B). |
| | OAC rule 3745-21-09(U)(2)(e)(i) | The maximum daily coating usage rate shall not exceed 8 gallons. |
| | OAC rule 3745-35-07(B) (Synthetic Minor to avoid Title V) | Combined emissions from all emission units at the facility shall not exceed 9.9 tons of any individual hazardous air pollutant (HAP), as a rolling, 12-month summation.<br><br>Combined emissions from all emission units at the facility shall not exceed |

24.9 tons of all HAPs, as a rolling, 12-month summation.

**2. Additional Terms and Conditions**

**2.a** The 64.3 lbs VOC/day emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

**B. Operational Restrictions**

None

**C. 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 volume, in gallons, of each coating employed.

   c. The total volume, in gallons, of all of the coatings employed.

2. The permittee shall collect and record the following information each month for the purpose of determining annual VOC emissions:

   a. The name and identification number of each coating employed.

   b. The volume, in gallons, of each coating employed.

   c. The VOC content of each coating, as applied, in pounds per gallon.

   d. The name and identification of each cleanup material employed.

   e. The number of gallons of each cleanup material employed.

   f. The number of gallons of each cleanup material drummed for shipment off site.

   g. The VOC content of each cleanup material, in pounds per gallon.

h. The total VOC emissions from all coatings and cleanup materials employed, in tons (i.e., the summation of the products of C.2.b. X C.2.c. for each coating material plus the sum of the products of [(C.2.e.-C.2.f.) X C.2.g.] for each cleanup material.

3. The permittee shall collect and record the following information each month for the entire facility (including, but not limited to emission units K001, K002, K003, K008 and R001):

a. The name and identification number of each coating employed.

b. The individual HAP content for each HAP of each coating material, in pounds of individual HAP per gallon, as applied.

c. The total combined HAP content of each coating material, in pounds of combined HAPs per gallon, as applied (the sum of all the individual HAP contents from C.3.b.).

d. The number of gallons of each coating employed.

e. The name and identification of cleanup material employed..

f. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of material, as applied.

g. The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (the sum of all the individual HAP contents from C.3.f.).

h. The number of gallons of each cleanup material employed.

i. The number of gallons of cleanup material recovered for disposal.

j. The total individual HAP emission rate, in pounds or tons per rolling, 12-month period, for each HAP (i.e., for each HAP, the sum of products of C.3.b. X C.3.d. for each coating material plus the sum of the products of [C.3.f. X (C.3.h.-C.3.i.)] for each cleanup material).

k. The total combined HAP emission rate, in pounds or tons per rolling, 12-month period, for all HAPs employed (i.e., the sum of the products of C.3.c. X C.3.d. for each coating material plus the sum of the products of [C.3.g. X (C.3.h. - C.3.i.)] for each cleanup material).

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local agency contact. This information does nor have to be kept on a line-by-line basis.

4. The permit to install for this emissions unit K008 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, for K001, K002, K003, K008 and R001. 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: | Methyl Isobutyl Ketone |
| TLV (mg/m3): | 205 |
| Maximum Hourly Emission Rate (lbs/hr): | 5.99 |
| Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): | 4,702 |
| MAGLC (ug/m3): | 4,877 |
| Pollutant: | Xylene |
| TLV (mg/m3): | 434 |
| Maximum Hourly Emission Rate (lbs/hr): | 5.37 |
| Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): | 4,213 |
| MAGLC (ug/m3): | 10,338 |
| Pollutant: | Toluene |
| TLV (mg/m3): | 188 |

| | |
|---|---|
| Maximum Hourly Emission Rate (lbs/hr): | 5.33 |
| Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): | 4,182 |
| MAGLC (ug/m3): | 4,486 |
| Pollutant: | Tetrachloroethylene |
| TLV (mg/m3): | 170 |
| Maximum Hourly Emission Rate (lbs/hr): | 1.83 |
| Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): | 1,436 |
| MAGLC (ug/m3): | 4,036 |
| Pollutant: | Ethylbenzene |
| TLV (mg/m3): | 434 |
| Maximum Hourly Emission Rate (lbs/hr): | 1.53 |
| Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): | 1,204 |
| MAGLC (ug/m3): | 10,338 |

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 still 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.

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.).

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

5. 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".

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.

## D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. 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 45 days after the exceedance occurs.

2. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

3. The permittee shall submit annual reports that specify the individual and/or combined HAP emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

4. The permittee shall submit quarterly deviation (excursion) reports that include the following:

   a. An identification of each month during which the rolling, 12-month individual facility HAP emission rate exceeded the 9.9 TPY rolling, 12-month individual facility HAP emission limitation, and the actual rolling, 12-month individual facility HAP emission rate for each such month.

   b. An identification of each month during which the rolling, 12-month combined facility HAP emission rate exceeded the 24.9 TPY rolling, 12-month combined facility HAP emission limitation, and the actual rolling, 12-month combined facility HAP emission rate for each such month.

5. These quarterly deviation reports (excursion) reports shall be submitted to the Ohio EPA Central District Office or local air agency by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

## E. Testing Requirements

1. Compliance with the specified emission limitations in Section A.1. of this permit shall be demonstrated in accordance with the following methods:

   a. Emission Limitation -
   64.3 lbs VOC/day, excluding cleanup

   Applicable Compliance Method -
   Compliance shall be determined by multiplying the maximum daily coating rate (8 gals ctg) by the maximum VOC content (8.04 lbs VOC/gal ctg).

   b. Emission Limitation -
   11.74 tons VOC/yr, including cleanup

   Applicable Compliance Method -
   Compliance shall be based upon the record keeping requirements specified in Section C.2. of this permit and shall be the summation of the 12 monthly VOC emission rates divided

by 2000 lbs/ton.

c. Emission Limitation -
Less than or equal to 8 gallons coating per day

Applicable Compliance Method -
Compliance shall be based upon the record keeping requirements specified in Section C.1. of this permit.

d. Emission Limitation-
9.9 TPY of an individual HAP, based on a 12-month rolling summation

Applicable Compliance Method
Compliance shall be based upon the record keeping requirements specified in Section C.3. of this permit.

e. Emission Limitation-
24.9 TPY of any combination of HAPs, based on a 12-month rolling summation

Applicable Compliance Method
Compliance shall be based upon the record keeping requirements specified in Section C.3, of this permit.

## F. Miscellaneous Requirements

1. Chapter 31 modification to 08-03460, issued January 31, 1996, to include federally enforceable facility wide emission limitations for HAPs and represents an increase in the VOC allowable emission limit of 2.73 TPY VOC.

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| R001 - Tension Torsion Strap Room<br><br>*Modification | OAC rule 3745-31-05(A)(3) | The organic compound (OC) emissions from this emissions unit shall not exceed 7.3 Tons per year (TPY).<br><br>The requirement of this rule shall also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and OAC rule 3745-35-07(B). |
| | OAC rule 3745-21-07(G)(2) | The Organic Compound (OC) emissions from this emissions unit shall not exceed 8 pounds per hour and 40 pounds per day |
| | OAC rule 3745-35-07(B) (Synthetic Minor to avoid Title V) | Combined emissions from all emission units at the facility shall not exceed 9.9 tons of any individual hazardous air pollutant (HAP), as a rolling, 12-month summation.<br><br>Combined emissions from all emission units at the facility shall not exceed 24.9 tons of all HAPs, as a rolling, 12-month summation. |

**2. Additional Terms and Conditions**

**2.a** None

**B. Operational Restrictions**

None

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information for each day for the operation:

   a. The name and identification for each material employed.

   b. The number of gallons of each material employed.

   c. The organic compound content of each material, in pounds per gallon.

   d. The number of gallons of organic material recovered for disposal off site as waste.

   e. The organic compound content of the waste, in pounds per gallon.

   f. The total organic compound emission rate for all materials, in pounds per day,( i.e., (b x c)-(d x e)).

   g. The number of hours the emission unit was in operation.

   h. The average hourly organic compound emission rate for all materials, in pounds per hour (average), (i.e., (f)/(g)).

2. The permittee shall collect and record the following information each month for the purpose of determining annual OC emissions:

   a. The name and identification number of each coating employed.

   b. The volume, in gallons, of each coating employed.

   c. The OC content of each coating, as applied, in pounds per gallon.

   d. The name and identification of each cleanup material employed.

e. The number of gallons of each cleanup material employed.

f. The number of gallons of each cleanup material drummed for shipment off site.

g. The OC content of each cleanup material, in pounds per gallon.

h. The total OC emissions from all coatings and cleanup materials employed, in tons (i.e., the summation of the products of C.2.b. X C.2.c. for each coating material plus the sum of the products of [(C.2.e.-C.2.f.) X C.2.g.] for each cleanup material.

3. The permittee shall collect and record the following information each month for this emission unit to determine annual Hazardous Air Pollutant (HAP)* emissions:

a. The name and identification number of each material employed.

b. The number of gallons of each material employed.

c. The HAP content of each individual HAP component in the material, in pounds of individual HAP per gallon of material.

d. The number of pounds of organic material recovered for disposal off site as waste (determined by the TSDF).

e. The amount of each individual HAP component in the waste removed, in percent by weight (as determined using mass balance).

f. The individual HAP emission rate, in pounds or tons per rolling, 12-month period, for each HAP, i.e., (b x c) - [(d x (e/100)].

g. The combined HAP emission rate, in pounds or tons per rolling, 12-month period, i.e., the sum of (f) for all individual HAPs.

* A listing of the HAPs can be found in Section 112 (b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency. This information does not have to be kept on a line-by-line basis

3. The permit to install for this emissions unit R001 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, for K001, K002, K003, K008 and R001. 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: | Methyl Isobutyl Ketone |
| TLV (mg/m3): | 205 |
| Maximum Hourly Emission Rate (lbs/hr): | 5.99 |
| Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): | 4,702 |
| MAGLC (ug/m3): | 4,877 |
| Pollutant: | Xylene |
| TLV (mg/m3): | 434 |
| Maximum Hourly Emission Rate (lbs/hr): | 5.37 |
| Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): | 4,213 |
| MAGLC (ug/m3): | 10,338 |
| Pollutant: | Toluene |
| TLV (mg/m3): | 188 |
| Maximum Hourly Emission Rate (lbs/hr): | 5.33 |
| Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): | 4,182 |
| MAGLC (ug/m3): | 4,486 |
| Pollutant: | Tetrachloroethylene |

| | |
|---|---|
| TLV (mg/m3): | 170 |
| Maximum Hourly Emission Rate (lbs/hr): | 1.83 |
| Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): | 1,436 |
| MAGLC (ug/m3): | 4,036 |
| Pollutant: | Ethylbenzene |
| TLV (mg/m3): | 434 |
| Maximum Hourly Emission Rate (lbs/hr): | 1.53 |
| Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): | 1,204 |
| MAGLC (ug/m3): | 10,338 |

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 still 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.

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.).

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

4. 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".

   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.

## D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:

   a. For the days during which an organic material was employed an identification of each day during which the average hourly organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.

   b. For the days during which an organic material was employed, an identification of each day during which the organic compound emissions from exceeded 40 pounds per day and the actual organic compound emissions from each such day.

3. The permittee shall submit annual reports that specify the individual and/or combined HAP emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

4. The permittee shall also submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

5. The permittee shall submit quarterly deviation (excursion) reports that include the following:

   a. An identification of each month during which the rolling, 12-month individual facility HAP emission rate exceeded the 9.9 TPY rolling, 12-month individual facility HAP emission limitation, and the actual rolling, 12-month individual facility HAP emission rate for each such month.

   b. An identification of each month during which the rolling, 12-month combined facility HAP emission rate exceeded the 24.9 TPY rolling, 12-month combined facility HAP emission limitation, and the actual rolling, 12-month combined facility HAP emission rate for each such month.

6. These quarterly deviation reports (excursion) reports shall be submitted to the Ohio EPA Central District Office or local air agency by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviation occurred during a calendar quarter, the permittee shall submit a report which states that no deviation occurred during the calendar quarter.

**E. Testing Requirements**

1. Compliance with the allowable emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:

   a. Emission Limitation:
   The organic compound emissions from this emission unit shall not exceed 8 pounds per hour.

   Applicable Compliance Method:
   Compliance shall be based upon the record keeping specified in section C.1.

   b. Emission Limitation:
   The organic compound emissions from this emission unit shall not exceed 40 pounds per day.

   Applicable Compliance Method:
   Compliance shall be based upon the record keeping specified in Section C.1.

   c. Emission Limitation:
   The organic compound emissions from this emission unit shall not exceed 7.3 tons per year.

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified Section C.

d. Emission Limitation-
9.9 TPY of an individual HAP, based on a 12-month rolling summation

Applicable Compliance Method
Compliance shall be based upon the record keeping requirements specified in Section C. of this permit.

e. Emission Limitation-
24.9 TPY of any combination of HAPs, based on a 12-month rolling summation

Applicable Compliance Method
Compliance shall be based upon the record keeping requirements specified in Section C. of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the materials employed in the emissions unit.

**F. Miscellaneous Requirements**

1. This is a Chapter 31 modification to 08-04496, issued September 9, 2003, to include federally enforceable facility wide emission limitations for HAPs.