



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

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

12/31/02

CERTIFIED MAIL

RE: Final Title V Administrative Permit Amendment Chapter 3745-77 permit

02-15-09-0195

Blackhawk Automotive Plastics Inc
Pamela J. McCoy
800 PENNSYLVANIA AVE.
SALEM, OH 44460-2780

Dear Pamela J. McCoy:

Enclosed is the Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully.

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

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

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

If you have any questions, please contact Northeast District Office.

Very truly yours,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

cc: Northeast District Office
File, DAPC PMU



State of Ohio Environmental Protection Agency

FINAL TITLE V ADMINISTRATIVE PERMIT AMENDMENT

Effective Date: 01/08/03	Expiration Date: 01/08/08	Modification Issue Date: 12/31/02
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This document constitutes issuance of a Title V permit for Facility ID: 02-15-09-0195 to:
 Blackhawk Automotive Plastics Inc
 800 PENNSYLVANIA AVE.
 SALEM, OH 44460-2780

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

R001 (P-1) PAINT SPRAY BOOTH	R024 (P-21) PAINT SPRAY BOOTH	R036 (P-41) ADHESIVE SPRAY BOOTH
R002 (P-2) PAINT SPRAY BOOTH	R025 (P-22) PAINT SPRAY BOOTH	R037 (V-10) PAINT SPRAY BOOTH
R003 (P-4) PAINT SPRAY BOOTH	R026 (P-23) PAINT SPRAY BOOTH	R038 (P-42) PAINT SPRAY BOOTH
R004 (P-5) PAINT SPRAY BOOTH	R027 (P-24) PAINT SPRAY BOOTH	R039 (P-43) PAINT SPRAY BOOTH
R006 (P-B) PAINT SPRAY BOOTH	R028 (P-30A) PAINT SPRAY BOOTH	R040 (P-44) PAINT SPRAY BOOTH
R007 (P-C) PAINT SPRAY BOOTH	R029 (P-30B) PAINT SPRAY BOOTH	R041 (P-45) PAINT SPRAY BOOTH
R014 (P-10) PAINT SPRAY BOOTH	R030 (P-30C) PAINT SPRAY BOOTH	R042 (P-46) PAINT SPRAY BOOTH
R015 (P-11) PAINT SPRAY BOOTH	R031 (P-31) PAINT SPRAY BOOTH	R043 (P-47) PAINT SPRAY BOOTH
R016 (P-12) PAINT SPRAY BOOTH	R032 (P-32) PAINT SPRAY BOOTH	R044 (P-25) PAINT SPRAY BOOTH
R018 (P-14) PAINT SPRAY BOOTH	R033 (V-9) PAINT SPRAY BOOTH	R045 (P-48) PAINT SPRAY BOOTH
R019 (P-13) PAINT SPRAY BOOTH	R034 (P-40) PAINT SPRAY BOOTH	
R023 (P-20) PAINT SPRAY BOOTH	R035 (A-128) ADHESIVE SPRAY BOOTH	

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Northeast District Office
 2110 East Aurora Road
 Twinsburg, OH 44087
 (330) 425-9171

OHIO ENVIRONMENTAL PROTECTION AGENCY

A handwritten signature in black ink, appearing to read "Christopher Jones", is written over a solid black horizontal line.

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. *State and Federally Enforceable Section*

1. **Monitoring and Related Record Keeping and Reporting Requirements**

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))
- b. 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 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.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, 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 taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance

with OAC rule 3745-15-06. The written 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.) See B.6 below if no deviations occurred during the quarter.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, record keeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, record keeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))

- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

2. 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, i.e., upset condition, of any emissions unit(s) 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upset conditions.

Except as provided in OAC rule 3745-15-06, 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).

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iii))

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

(Authority for term: OAC rule 3745-77-07(A)(5))

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

(Authority for term: OAC rule 3745-77-07(A)(6))

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.10 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. 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 request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may

furnish such records directly to the Administrator along with a claim of confidentiality.

(Authority for term: OAC rule 3745-77-07(A)(7))

7. 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.

(Authority for term: OAC rule 3745-77-07(A)(8))

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

10. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or

other terms and conditions of this permit related to such federally applicable requirements.

- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

11. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

12. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

- i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
- i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - ii. Compliance certifications shall include the following:
 - (a) An identification of each term or condition of this permit that is the basis of the certification.
 - (b) The permittee's current compliance status.
 - (c) Whether compliance was continuous or intermittent.
 - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
 - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
 - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

13. Permit Shield

- a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in

OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

15. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

16. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition;
- b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change;
- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F);
- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes; and
- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(For purposes of clarification, the permittee can refer to Engineering Guide #63 that is available in the STARSHIP software package.)
(*Authority for term: OAC rule 3745-77-07(I)*)

17. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

(*This term is provided for informational purposes only.*)

18. Insignificant Activities

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.

(*Authority for term: OAC rule 3745-77-07(A)(1)*)

19. Permit to Install Requirement

Prior to the “installation” or “modification” of any “air contaminant source,” as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(*Authority for term: OAC rule 3745-77-07(A)(1)*)

20. 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.

(*Authority for term: OAC rule 3745-77-07(A)(1)*)

B. *State Only Enforceable Section*

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping 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 record keeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the 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.)

2. 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.

3. 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.

4. 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).

5. 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.

6. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

1. All asbestos renovation and demolition activities conducted at this facility shall be performed in accordance with the applicable requirements specified in 40 CFR Part 61 and OAC Chapter 3745-20.

B. State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

P005 - Batch Oven P - D
P006 - Batch Oven V - 7
P007 - Batch Oven V - 8
R010 - P - 6 Spray Booth
Z001 - Batch Oven V - 23
Z002 - Electric Test Oven
Z004 - Mold Press #2
Z006 - Mold Press #4
Z008 - Mold Press #6
Z009 - Mold Press #7
Z011 - Mold Press #10
Z012 - Mold Press #11B
Z013 - Mold Press #12
Z014 - Mold Press #13B
Z015 - Mold Press #14
Z016 - Mold Press #15
Z017 - Mold Press #16A
Z018 - Mold Press #17
Z019 - Mold Press #18
Z020 - Mold Press #19
Z021 - Mold Press #20
Z022 - Mold Press #21
Z023 - Mold Press #22A
Z024 - Mold Press #23
Z026 - Mold Press #25A
Z027 - Mold Press #26

B. State Only Enforceable Section (continued)

Z028 - Mold Press #27
Z029 - Mold Press #28
Z030 - Mold Press #29
Z031 - Mold Press #30
Z032 - Mold Press #31A
Z033 - Mold Press #32A
Z034 - Mold Press #33
Z035 - Mold Press #34
Z036 - Mold Press #35
Z037 - Mold Press #36
Z038 - Mold Press #37A
Z040 - Mold Press #39A
Z041 - Mold Press #40
Z043 - Mold Press #42
Z044 - Mold Press #43
Z045 - Mold Press #44
Z046 - Press Dept. Wipe Cleaning
Z047 - Paint Dept. Wipe Cleaning
Z048 - Pad Printing Operation
Z049 - Parts Washer #1
Z050 - Parts Washer #2
Z051 - Parts Washer #3
Z052 - Parts Washer #4
Z053 - Caustic Dip Tank
Z054 - Vacuum Former #1
Z055 - Vacuum Former #2
Z056 - Resin Storage Silo #1
Z057 - Resin Storage Silo #2
Z058 - Resin Storage Silo #3
Z059 - Resin Storage Silo #4
Z060 - Resin Storage Silo #5
Z061 - Resin Storage Silo #6
Z062 - Resin Storage Silo #7
Z063 - Pneumatic Conveying Line #1
Z064 - Pneumatic Conveying Line #2

B. State Only Enforceable Section (continued)

- Z065 - Pneumatic Conveying Line #3
- Z066 - Pneumatic Conveying Line #4
- Z067 - Pneumatic Conveying Line #5
- Z068 - Mask Washer P - 48
- Z069 - Mask Washer P39
- Z070 - Mask Washer P38
- Z071 - Mask Washer P56
- Z072 - 5.5 MMBtu/hr Gas Fired Air Makeup Unit
- Z074 - Grinder SG4
- Z075 - Grinder SG6
- Z076 - Grinder SG7
- Z077 - Grinder SG8
- Z078 - Grinder SG9
- Z079 - Grinder SG10
- Z080 - Grinder SG12
- Z081 - Grinder SG14
- Z082 - Grinder SG15
- Z084 - Grinder SG17
- Z085 - Grinder SG18
- Z086 - Grinder SG19
- Z088 - Grinder SG21
- Z089 - Grinder SG22
- Z090 - Grinder SG23
- Z091 - Grinder SG24
- Z092 - Grinder SG25
- Z093 - Grinder SG26
- Z094 - Grinder SG27
- Z095 - Grinder SG28
- Z096 - Grinder SG29
- Z097 - Grinder SG30

B. State Only Enforceable Section (continued)

Z098 - Grinder SG31
Z099 - Grinder SG32
Z100 - Grinder SG33
Z101 - Grinder SG34
Z102 - Grinder SG35
Z103 - Grinder SG36
Z104 - Grinder SG37
Z105 - Grinder SG38
Z106 - Grinder SG39
Z107 - Grinder SG40
Z108 - Grinder SG41
Z109 - Grinder SG42
Z110 - Grinder SG43
Z111 - Grinder SG44
Z112 - Grinder SG45
Z113 - Grinder SG46
Z114 - Grinder SG47
Z115 - Grinder SG48
Z116 - Grinder SG49
Z117 - Grinder SG50
Z118 - Grinder SG51
Z119 - Grinder SG52
Z120 - Grinder SG53
Z121 - Grinder SG54
Z122 - Grinder SG55
Z123 - Storage Tank #1
Z124 - Storage Tank #2
Z125 - Storage Tank #3
Z126 - Storage Tank #4
Z127 - Paint Mix Room

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a Permit to Install for the emissions unit.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: P-1 (R001)
Activity Description: PAINT SPRAY BOOTH

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth P - 1	OAC rule 3745-21-07 (G)(2) OAC rule 3745-17-07 (A)(1) OAC rule 3745-17-11 (B)(1)	See A.I.2.a. 20% opacity as a six-minute average, except as provided by rule 0.551 lb particulate emissions (PE) per hour

2. Additional Terms and Conditions

- 2.a Pursuant to the provisions of OAC rules 3745-21-07(A)(1) and 3745-15-01(O), this emissions unit is an "existing source" which is not located in a "Priority 1" county as indicated in paragraph (A) of OAC rule 3745-21-06. The provisions of OAC rule 3745-21-07(G)(2), therefore, do not apply.

II. Operational Restrictions

1. The permittee shall operate a dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any daily record showing that the dry filtration system was 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 Northeast District Office of the Ohio EPA) within 45 days after the exceedance occurs.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
0.551 lb particulate emissions(PE)/hr

Applicable Compliance Method:

To determine the actual worst case emission rate for particulate emissions, the following equation shall be used:

$$PE = \text{maximum coating solids usage rate (in pounds per hour)} \times (1-TE) \times (1-CE)$$

Where,

PE = particulate emission rate (lb/hr)

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

1.b Emission Limitation:
20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

U.S.EPA Method 9, if required

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: P-2 (R002)
Activity Description: PAINT SPRAY BOOTH

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth P - 2	OAC rule 3745-21-07 (G)(2) OAC rule 3745-17-07 (A)(1) OAC rule 3745-17-11 (B)(1)	See A.I.2.a. 20% opacity as a six-minute average, except as provided by rule 0.551 lb particulate emissions (PE) per hour

2. Additional Terms and Conditions

- 2.a. Pursuant to the provisions of OAC rules 3745-21-07(A)(1) and 3745-15-01(O), this emissions unit is an "existing source" which is not located in a "Priority 1" county as indicated in paragraph (A) of OAC rule 3745-21-06. The provisions of OAC rule 3745-21-07(G)(2), therefore, do not apply.

II. Operational Restrictions

1. The permittee shall operate a dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any daily record showing that the dry filtration system was 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 Northeast District Office of the Ohio EPA) within 45 days after the exceedance occurs.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

- 1.a** Emission Limitation:
0.551 lb particulate emissions(PE)/hr

Applicable Compliance Method:

To determine the actual worst case emission rate for particulate emissions, the following equation shall be used:

$$PE = \text{maximum coating solids usage rate (in pounds per hour)} \times (1-TE) \times (1-CE)$$

Where,

PE = particulate emission rate (lb/hr)

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

- 1.b** Emission Limitation:
20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

U.S.EPA Method 9, if required

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: P-4 (R003)
Activity Description: PAINT SPRAY BOOTH

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth P - 4	OAC rule 3745-21-07 (G)(2) OAC rule 3745-17-07 (A)(1) OAC rule 3745-17-11 (B)(1)	See A.I.2.a. 20% opacity as a six-minute average, except as provided by rule 0.551 lb particulate emissions (PE) per hour

2. Additional Terms and Conditions

- 2.a. Pursuant to the provisions of OAC rules 3745-21-07(A)(1) and 3745-15-01(O), this emissions unit is an "existing source" which is not located in a "Priority 1" county as indicated in paragraph (A) of OAC rule 3745-21-06. The provisions of OAC rule 3745-21-07(G)(2), therefore, do not apply.

II. Operational Restrictions

1. The permittee shall operate a dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any daily record showing that the dry filtration system was 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 Northeast District Office of the Ohio EPA) within 45 days after the exceedance occurs.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
0.551 lb particulate emissions(PE)/hr

Applicable Compliance Method:

To determine the actual worst case emission rate for particulate emissions, the following equation shall be used:

$PE = \text{maximum coating solids usage rate (in pounds per hour)} \times (1-TE) \times (1-CE)$

Where,

PE = particulate emission rate (lb/hr)

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

1.b Emission Limitation:
20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:
U.S.EPA Method 9, if required

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: P-5 (R004)
Activity Description: PAINT SPRAY BOOTH

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth P - 5	OAC rule 3745-21-07 (G)(2) OAC rule 3745-17-07 (A)(1) OAC rule 3745-17-11 (B)(1)	See A.I.2.a. 20% opacity as a six-minute average, except as provided by rule 0.551 lb particulate emissions (PE) per hour

2. Additional Terms and Conditions

- 2.a Pursuant to the provisions of OAC rules 3745-21-07(A)(1) and 3745-15-01(O), this emissions unit is an "existing source" which is not located in a "Priority 1" county as indicated in paragraph (A) of OAC rule 3745-21-06. The provisions of OAC rule 3745-21-07(G), therefore, do not apply.

II. Operational Restrictions

1. The permittee shall operate a dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any daily record showing that the dry filtration system was 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 Northeast District Office of the Ohio EPA) within 45 days after the exceedance occurs.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
0.551 lb particulate emissions(PE)/hr

Applicable Compliance Method:

To determine the actual worst case emission rate for particulate emissions, the following equation shall be used:

$PE = \text{maximum coating solids usage rate (in pounds per hour)} \times (1-TE) \times (1-CE)$

Where,

PE = particulate emission rate (lb/hr)

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

1.b Emission Limitation:
20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

U.S.EPA Method 9, if required

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: P-B (R006)
Activity Description: PAINT SPRAY BOOTH

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth P - B	OAC rule 3745-21-07 (G)(2) OAC rule 3745-17-07 (A)(1) OAC rule 3745-17-11 (B)(1)	See A.I.2.a. 20% opacity as a six-minute average, except as provided by rule 0.551 lb particulate emissions (PE) per hour

2. Additional Terms and Conditions

- Pursuant to the provisions of OAC rules 3745-21-07(A)(1) and 3745-15-01(O), this emissions unit is an "existing source" which is not located in a "Priority 1" county as indicated in paragraph (A) of OAC rule 3745-21-06. The provisions of OAC rule 3745-21-07(G)(2), therefore, do not apply.

II. Operational Restrictions

- The permittee shall operate a dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

- The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any daily record showing that the dry filtration system was 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 Northeast District Office of the Ohio EPA) within 45 days after the exceedance occurs.

V. Testing Requirements

- Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
0.551 lb particulate emissions(PE)/hr

Applicable Compliance Method:

To determine the actual worst case emission rate for particulate emissions, the following equation shall be used:

$PE = \text{maximum coating solids usage rate (in pounds per hour)} \times (1-TE) \times (1-CE)$

Where,

PE = particulate emission rate (lb/hr)

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

1.b Emission Limitation:
20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

U.S.EPA Method 9, if required

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: P-C (R007)
Activity Description: PAINT SPRAY BOOTH

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth P - C	OAC rule 3745-21-07 (G)(2) OAC rule 3745-17-07 (A)(1) OAC rule 3745-17-11 (B)(1)	See A.I.2.a. 20% opacity as a six-minute average, except as provided by rule 0.551 lb particulate emissions (PE) per hour

2. Additional Terms and Conditions

- Pursuant to the provisions of OAC rules 3745-21-07(A)(1) and 3745-15-01(O), this emissions unit is an "existing source" which is not located in a "Priority 1" county as indicated in paragraph (A) of OAC rule 3745-21-06. The provisions of OAC rule 3745-21-07(G)(2), therefore, do not apply.

II. Operational Restrictions

- The permittee shall operate a dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

- The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any daily record showing that the dry filtration system was 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 Northeast District Office of the Ohio EPA) within 45 days after the exceedance occurs.

V. Testing Requirements

- Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
0.551 lb particulate emissions(PE)/hr

Applicable Compliance Method:

To determine the actual worst case emission rate for particulate emissions, the following equation shall be used:

$$PE = \text{maximum coating solids usage rate (in pounds per hour)} \times (1-TE) \times (1-CE)$$

Where,

PE = particulate emission rate (lb/hr)

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

1.b Emission Limitation:
20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

U.S.EPA Method 9, if required

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: P-10 (R014)
Activity Description: PAINT SPRAY BOOTH

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth P - 10	OAC rule 3745-21-07 (G)(2) OAC rule 3745-17-07 (A)(1) OAC rule 3745-17-11 (B)(1)	See A.I.2.a. 20% opacity as a six-minute average, except as provided by rule 0.551 lb particulate emissions (PE) per hour

2. Additional Terms and Conditions

- 2.a. Pursuant to the provisions of OAC rules 3745-21-07(A)(1) and 3745-15-01(O), this emissions unit is an "existing source" which is not located in a "Priority 1" county as indicated in paragraph (A) of OAC rule 3745-21-06. The provisions of OAC rule 3745-21-07(G)(2), therefore, do not apply.

II. Operational Restrictions

1. The permittee shall operate a dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any daily record showing that the dry filtration system was 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 Northeast District Office of the Ohio EPA) within 45 days after the exceedance occurs.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
0.551 lb particulate emissions(PE)/hr

Applicable Compliance Method:

To determine the actual worst case emission rate for particulate emissions, the following equation shall be used:

$$PE = \text{maximum coating solids usage rate (in pounds per hour)} \times (1-TE) \times (1-CE)$$

Where,

PE = particulate emission rate (lb/hr)

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

1.b Emission Limitation:
20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

U.S.EPA Method 9, if required

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: P-11 (R015)
Activity Description: PAINT SPRAY BOOTH

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth P - 11	OAC rule 3745-21-07 (G)(2) OAC rule 3745-17-07 (A)(1) OAC rule 3745-17-11 (B)(1)	See A.I.2.a. 20% opacity as a six-minute average, except as provided by rule 0.551 lb particulate emissions (PE) per hour

2. Additional Terms and Conditions

- 2.a Pursuant to the provisions of OAC rules 3745-21-07(A)(1) and 3745-15-01(O), this emissions unit is an "existing source" which is not located in a "Priority 1" county as indicated in paragraph (A) of OAC rule 3745-21-06. The provisions of OAC rule 3745-21-07(G)(2), therefore, do not apply.

II. Operational Restrictions

1. The permittee shall operate a dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any daily record showing that the dry filtration system was 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 Northeast District Office of the Ohio EPA) within 45 days after the exceedance occurs.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
0.551 lb particulate emissions(PE)/hr

Applicable Compliance Method:

To determine the actual worst case emission rate for particulate emissions, the following equation shall be used:

$$PE = \text{maximum coating solids usage rate (in pounds per hour)} \times (1-TE) \times (1-CE)$$

Where,

PE = particulate emission rate (lb/hr)

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

1.b Emission Limitation:
20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:
U.S.EPA Method 9, if required

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: P-12 (R016)
Activity Description: PAINT SPRAY BOOTH

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth P -12	OAC rule 3745-21-07 (G)(2) OAC rule 3745-17-07 (A)(1) OAC rule 3745-17-11 (B)(1)	See A.I.2.a. 20% opacity as a six-minute average, except as provided by rule 0.551 lb particulate emissions (PE) per hour

2. Additional Terms and Conditions

- 2.a Pursuant to the provisions of OAC rules 3745-21-07(A)(1) and 3745-15-01(O), this emissions unit is an "existing source" which is not located in a "Priority 1" county as indicated in paragraph (A) of OAC rule 3745-21-06. The provisions of OAC rule 3745-21-07(G)(2), therefore, do not apply.

II. Operational Restrictions

1. The permittee shall operate a dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any daily record showing that the dry filtration system was 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 Northeast District Office of the Ohio EPA) within 45 days after the exceedance occurs.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
0.551 lb particulate emissions(PE)/hr

Applicable Compliance Method:

To determine the actual worst case emission rate for particulate emissions, the following equation shall be used:

$$PE = \text{maximum coating solids usage rate (in pounds per hour)} \times (1-TE) \times (1-CE)$$

Where,

PE = particulate emission rate (lb/hr)

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

1.b Emission Limitation:
20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

U.S.EPA Method 9, if required

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: P-14 (R018)
Activity Description: PAINT SPRAY BOOTH

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth P - 14	OAC rule 3745-31-05 (A)(3) (PTI No. 02-17288)	Volatile organic compounds (VOC) emissions shall not exceed 20.0 lbs per hour on any day no photochemically reactive materials are employed. Particulate emissions (PE) shall not exceed 0.42 lb per hour and 0.57 ton per year. Organic compounds (OC) emissions shall not exceed 8 lbs per hour and 40 lbs per day, including cleanup materials, on any day photochemically reactive materials are employed.
	OAC rule 3745-31-05 (D)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05 (D), 3745-17-07 (A)(1), 3745-17-11 (B)(1), and 3745-21-07 (G)(2). VOC emissions shall not exceed 6.83 tons VOC per rolling 12-months, including cleanup materials.
	OAC rule 3745-17-07 (A)(1)	Visible emissions shall not exceed 20 % opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11 (B)(1)	The requirements of OAC rule 3745-17-11 (B)(1) are less stringent than the requirements established pursuant to OAC rule 3745-31-05 (A)(3).

**Operations, Property,
and/or Equipment**

**Applicable Rules/
Requirements**

**Applicable Emissions
Limitations/Control
Measures**

OAC rule 3745-21-07 (G)(2)

The requirements of OAC rule 3745-21-07 (G)(2) are less stringent than the requirements established pursuant to OAC rule 3745-31-05 (A)(3).

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The maximum annual volatile organic material usage* (from inks, coatings and adhesive) for R018 shall not exceed 6.83 tons, based upon a rolling, 12-month summation of the volatile organic material figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of the permit to install, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable, Cumulative VOC Emissions (Tons)
1	1.1
1 - 2	2.1
1 - 3	3.2
1 - 4	3.6
1 - 5	4.0
1 - 6	4.4
1 - 7	4.8
1 - 8	5.3
1 - 9	5.7
1 - 10	6.1
1 - 11	6.5
1 - 12	6.83

* For the purposes of demonstrating compliance with the annual emission limit, the permittee shall calculate the annual emission limit by assuming 100% of the volatile organic material used is emitted. Volatile organic material used can be calculated by multiplying the VOC content of the materials used by the quantity of material used.

2. After the first 12 calendar months of operation following the issuance of the permit to install, compliance with the rolling 12-month VOC emission limitation shall be based upon the rolling 12-month summations of the monthly emissions of VOC.
3. The permittee shall operate a dry filtration system for this emissions unit whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit.
 - 1.a The company identification for each coating, adhesive, and cleanup material employed.
 - 1.b The number of gallons of each coating, adhesive, and cleanup material employed.
 - 1.c The OC content of each coating, adhesive, and cleanup material, on any day in which a photochemically reactive material is applied in this emissions unit, in pounds per gallon.

III. Monitoring and/or Record Keeping Requirements (continued)

- 1.d The VOC content of each coating, adhesive, and cleanup material, in pounds per gallon.
- 1.e A determination and documentation as to whether or not each material is a photochemically reactive material.
- 1.f The total OC emission rate for all coatings and cleanup materials employed, in pounds per day, calculated as the sum of (b) x (c) for each material employed on any day photochemically reactive materials were employed.
- 1.g The total VOC emission rate for all coatings and cleanup materials employed, in pounds per day, calculated as the sum of (b) x (d) for each material employed on any day only nonphotochemically reactive materials were employed.
- 1.h The number of hours this emissions unit operated each day.
- 1.i The average pounds OC per hour, calculated as (f) / (h).
- 1.j The average pounds VOC per hour, calculated as (g) / (h).
- 1.k The solids content of each coating employed, in pounds per gallon.
- 2. The permittee shall maintain monthly records of the following information for this emissions unit.
 - 2.a The total VOC emissions, in tons.
 - 2.b During the first 12 calendar months of operation following the issuance of the permit to install, the cumulative VOC emissions, in tons.
 - 2.c After the first 12 calendar months of operation following the issuance of the permit to install, the rolling 12-month summation of the monthly VOC emissions, in tons.
- 3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

- 1. The permittee shall submit quarterly deviation (excursion) reports that identify each day when no photochemically reactive materials were employed and the average hourly VOC emissions exceeded 20 pounds.
- 2. The permittee shall submit quarterly deviation (excursion) reports that identify each day when photochemically reactive materials were employed and the average hourly OC emissions exceeded 8 pounds.
- 3. The permittee shall submit quarterly deviation (excursion) reports that identify each day when photochemically reactive materials were employed and the daily OC emissions exceeded 40 pounds.
- 4. The permittee shall submit quarterly deviation (excursion) reports that identify each month the maximum allowable, cumulative VOC emission limitation was exceeded.
- 5. The permittee shall submit quarterly deviation (excursion) reports that identify each month the rolling 12-month VOC emission limitation was exceeded.
- 6. The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c. of this permit.
- 7. The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any daily record showing that the dry filtration system was 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 Northeast District Office of the Ohio EPA) within 45 days after the exceedance occurs.

V. Testing Requirements

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

1.a Emission Limitations:
20 pounds VOC per hour, including cleanup, on each day no photochemically reactive materials are employed.

8 lbs OC per hour and 40 pounds OC per day, including cleanup, on each day any photochemically reactive material (coating, adhesive, or cleanup material) is employed.

Applicable Compliance Method:

Compliance shall be determined based upon record keeping specified in A.III.1. Formulation data or US EPA Method 24 (for coatings) shall be used to determine the VOC/OC contents of the coatings, adhesives, and cleanup materials.

1.b Emission Limitation:
6.83 tons VOC per rolling 12-months and the cumulative VOC emissions for the first 12 months of operation

Applicable Compliance Method:

Compliance shall be determined by summing the emissions determined based upon the record keeping specified in A.III.2. Formulation data or US EPA Method 24 (for coatings) shall be used to determine the VOC contents of the coatings, adhesives, and cleanup materials.

1.c Emission Limitation:
0.42 lb PE per hour

Applicable Compliance Method:

To determine the actual worst case emission rate for PE, the following equation shall be used:

$$PE = \text{maximum coating solids usage rate (in pounds per hour)} \times (1-TE) \times (1-CE)$$

Where,

PE = particulate emission rate (lb/hr)

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

1.d Emission Limitation:
0.57 ton PE per year

Applicable Compliance Method:

Compliance shall be determined using the equation in Part III.A.V.1.c., where the maximum coating solids usage rate is for the year rather than for an hour, to determine the lbs PE/year. Then, multiply this figure by ton/2000 lbs to determined ton PE/year.

1.e Emission Limitation:
20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined by a visual determination of opacity performed in accordance with U.S.EPA Method 9.

VI. Miscellaneous Requirements

None

Facility Name: **Blackhawk Automotive Plastics, Inc.**
Facility ID: **02-15-09-0195**
Emissions Unit: **P-14 (R018)**

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth P - 14		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit (R018) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 3.53

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 532

MAGLC (ug/m3): 4,476

Pollutants: 2-Butoxy Ethanol

TLV (mg/m3): 97

Maximum Hourly Emission Rate (lbs/hr): 2.09

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 341

MAGLC (ug/m3): 2,310

Pollutant: Butyl Acetate

TLV (mg/m3): 712

Maximum Hourly Emission Rate (lbs/hr): 6.62

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 995

MAGLC (ug/m3): 16,976

Pollutant: Acetone

TLV (mg/m3): 1,187

Maximum Hourly Emission Rate (lbs/hr): 8.10

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 1,218

MAGLC (ug/m3): 28,261

Pollutant: 1-Butanol

TLV (mg/m3): 152C

Maximum Hourly Emission Rate (lbs/hr): 3.17

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 477

MAGLC (ug/m3): 1,444

Pollutant: Isobutanol

TLV (mg/m3): 152

Maximum Hourly Emission Rate (lbs/hr): 4.05

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 609

MAGLC (mg/m3): 3,609

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: P-13 (R019)
Activity Description: PAINT SPRAY BOOTH

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth P - 13	OAC rule 3745-21-07 (G)(2) OAC rule 3745-17-07 (A)(1) OAC rule 3745-17-11 (B)(1)	See A.I.2.a. 20% opacity as a six-minute average, except as provided by rule 0.551 lb particulate emissions (PE) per hour

2. Additional Terms and Conditions

- 2.a Pursuant to the provisions of OAC rules 3745-21-07(A)(1) and 3745-15-01(O), this emissions unit is an "existing source" which is not located in a "Priority 1" county as indicated in paragraph (A) of OAC rule 3745-21-06. The provisions of OAC rule 3745-21-07(G)(2), therefore, do not apply.

II. Operational Restrictions

1. The permittee shall operate a dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records which identify any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any daily record showing that the dry filtration system was 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 Northeast District Office of the Ohio EPA) within 45 days after the exceedance occurs.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:
0.551 lb particulate emissions(PE)/hr

Applicable Compliance Method:

To determine the actual worst case emission rate for particulate emissions, the following equation shall be used:

$PE = \text{maximum coating solids usage rate (in pounds per hour)} \times (1-TE) \times (1-CE)$

Where,

PE = particulate emission rate (lb/hr)

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

1.b Emission Limitation:
20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

U.S.EPA Method 9, if required

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: P-20 (R023)
Activity Description: PAINT SPRAY BOOTH

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth P - 20	OAC rule 3745-21-07 (G)(2)	8 lb organic compounds (OC) per hour and 40 lbs OC per day for any day when a photochemically reactive material (coating or cleanup material) is employed.
	OAC rule 3745-17-07 (A)(1)	20% opacity as a six-minute average, except as provided by rule
	OAC rule 3745-17-11 (B)(1)	0.551 lb particulate emissions (PE) per hour
	OAC rule 3745-31-05 (A)(3) (PTI No. 17-039)	The requirements established pursuant to OAC rule 3745-31-05 (A)(3) are equivalent to the requirements established pursuant to OAC rules 3745-21-07(G)(2), 3745-17-07 (A)(1), and 3745-17-11 (B)(1).

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The permittee shall operate a dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 17-039, issued on December 31, 1979, and modified on March 21, 1990: A.III.2. and A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall collect and record the following information each day a photochemically reactive material (coating or cleanup material) is employed in this emissions unit.
 - 2.a The company identification for each coating and photochemically reactive cleanup material employed.
 - 2.b The number of gallons of each coating and photochemically reactive cleanup material employed.
 - 2.c The organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon.
 - 2.d The total organic compound emission rate for all coatings and photochemically reactive cleanup materials, calculated as the sum of (b) x (c) for all coatings and photochemically reactive cleanup materials, in pounds per day.
 - 2.e The total number of hours the emissions unit was in operation.
 - 2.f The average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, calculated as (d) / (e), in pounds per hour.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive" is based upon OAC rule 3745-21-01(C)(5).]

3. The permittee shall maintain daily records which identify any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 17-039, issued on December 31, 1979, and modified on March 21, 1990: A.IV.2., A.IV.3., A.IV.4., and A.IV.5. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the hourly mass emissions limitation.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the daily mass emissions limitation.
4. The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c. of this permit.
5. The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any daily record showing that the dry filtration system was 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 Northeast District Office of the Ohio EPA) within 45 days after the exceedance occurs.

V. Testing Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #17 - 039, issued on December 31, 1979, and modified on March 21, 1990: A.V.2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
2. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

- 2.a** Emission Limitation:
8 pounds OC per hour and 40 pounds OC per day any day for any day when a photochemically reactive material (coating or cleanup material) is used

Applicable Compliance Method:

Compliance shall be determined by the record keeping specified in A.III.2. Formulation data or USEPA Method 24 (for coatings) shall be used to determine the organic compound contents of the coatings and cleanup materials.

- 2.b** Emission Limitation:
0.551 lb PE/hr

Applicable Compliance Method:

To determine the actual worst case emission rate for particulate emissions, the following equation shall be used:

$$PE = \text{maximum coating solids usage rate (in pounds per hour)} \times (1-TE) \times (1-CE)$$

Where,

PE = particulate emission rate (lb/hr)

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

- 2.c** Emission Limitation:
20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

U.S.EPA Method 9, if required

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: P-21 (R024)
Activity Description: PAINT SPRAY BOOTH

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth P - 21	OAC rule 3745-21-07 (G)(2)	8 lb organic compounds (OC) per hour and 40 lbs OC per day for any day when a photochemically reactive material (coating or cleanup material) is employed.
	OAC rule 3745-17-07 (A)(1)	20% opacity, as a six-minute average, except as provided by rule
	OAC rule 3745-17-11 (B)(1)	0.551 lb particulate emission (PE) per hour
	OAC rule 3745-31-05 (A)(3) (PTI No. 17-039)	The requirements established pursuant to OAC rule 3745-31-05 (A)(3) are equivalent to the requirements established pursuant to OAC rules 3745-21-07(G)(2), 3745-17-07 (A)(1), and 3745-17-11 (B)(1).

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The permittee shall operate a dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 17-039, issued on December 31, 1979, and modified on March 21, 1990: A.III.2. and A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall collect and record the following information each day a photochemically reactive material (coating or cleanup material) is employed in this emissions unit.
 - 2.a The company identification for each coating and photochemically reactive cleanup material employed.
 - 2.b The number of gallons of each coating and photochemically reactive cleanup material employed.
 - 2.c The organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon.
 - 2.d The total organic compound emission rate for all coatings and photochemically reactive cleanup materials, calculated as the sum of (b) x (c) for all coatings and photochemically reactive cleanup materials employed, in pounds per day.
 - 2.e The total number of hours the emissions unit was in operation.
 - 2.f The average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, calculated as (d) / (e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive" is based upon OAC rule 3745-21-01(C)(5).]

3. The permittee shall maintain daily records which identify any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 17-039, issued on December 31, 1979, and modified on March 21, 1990: A.IV.2., A.IV.3., A.IV.4., and A.IV.5. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit quarterly deviation (excursion) reports that identify each day a photochemically reactive material was employed and the hourly mass emissions limitation was exceeded.
3. The permittee shall submit quarterly deviation (excursion) reports that identify each day a photochemically reactive material was employed and the daily mass emissions limitation was exceeded.
4. The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c. of this permit.
5. The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any daily record showing that the dry filtration system was 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 Northeast District Office of the Ohio EPA) within 45 days after the exceedance occurs.

V. Testing Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #17 - 039, issued on December 31, 1979, and March 21, 1990: A.V.2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
2. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

- 2.a** Emission Limitation
8 pounds OC per hour and 40 pounds OC per day for any day when a photochemically reactive material (coating or cleanup material) is used

Applicable Compliance Method

Compliance shall be determined by record keeping specified in A.III.2. Formulation data or USEPA Method 24 (for coatings) shall be used to determine the organic compound contents of the coatings and cleanup materials.

- 2.b** Emission Limitation:
0.551 lb particulate emissions(PE)/hr

Applicable Compliance Method:

To determine the actual worst case emission rate for particulate emissions, the following equation shall be used:

$$PE = \text{maximum coating solids usage rate (in pounds per hour)} \times (1-TE) \times (1-CE)$$

Where,

PE = particulate emission rate (lb/hr)

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

- 2.c** Emission Limitation:
20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

U.S.EPA Method 9, if required

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: P-22 (R025)
Activity Description: PAINT SPRAY BOOTH

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth P - 22	OAC rule 3745-21-07 (G)(2)	8 lb organic compounds (OC) per hour and 40 lbs OC per day for any day when a photochemically reactive material (coating or cleanup material) is employed.
	OAC rule 3745-17-07 (A)(1)	20 % opacity, as a six-minute average, except as provided by the rule.
	OAC rule 3745-17-11 (B)(1)	0.551 lb particulate emissions (PE) per hour
	OAC rule 37445-31-05 (A)(3) (PTI # 17-039)	The requirements established pursuant to OAC rule 3745-31-05 (A)(3) are equivalent to the requirements established pursuant to OAC rules 3745-21-07(G)(2), 3745-17-07 (A)(1), and 3745-17-11 (B)(1).

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The permittee shall operate a dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 17 - 039, issued on December 31, 1979, and modified on March 21, 1990: A.III.2. and A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall collect and record the following information each day a photochemically reactive material (coating or cleanup material) is employed in this emissions unit.
 - 2.a The company identification for each coating and photochemically reactive cleanup material employed.
 - 2.b The number of gallons of each coating and photochemically reactive cleanup material employed.
 - 2.c The organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon.
 - 2.d The total organic compound emission rate for all coatings and photochemically reactive cleanup materials, calculated as the sum of (b) x (c) for all coatings and photochemically reactive cleanup materials, in pounds per day.
 - 2.e The total number of hours the emissions unit was in operation.
 - 2.f The average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, calculated as (d) / (e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive" is based upon OAC rule 3745-21-01(C)(5).]

3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 17 - 039, issued on December 31, 1979, and modified on March 21, 1990: A.IV.2., A.IV.3., A.IV.4., and A.IV.5. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit quarterly deviation (excursion) reports that identify each day photochemically reactive materials were employed in this emissions unit and the hourly mass emissions limitation was exceeded.
3. The permittee shall submit quarterly deviation (excursion) reports that identify each day a photochemically reactive materials was employed in this emissions unit and the daily mass emissions limitation was exceeded.
4. The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c. of this permit.
5. The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any daily record showing that the dry filtration system was 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 Northeast District Office of the Ohio EPA) within 45 days after the exceedance occurs.

V. Testing Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #17 - 039, issued on December 31, 1979, and modified on March 21, 1990: A.V.2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
2. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

- 2.a** Emission Limitation
8 pounds OC per hour and 40 pounds OC per day for any day when a photochemically reactive material (coating or cleanup material) is used

Applicable Compliance Method

Compliance shall be determined by daily record keeping specified in A.III.2. Formulation data or USEPA Method 24 (for coatings) shall be used to determine the organic compound contents of the coatings and cleanup materials.

- 2.b** Emission Limitation:
0.551 lb particulate emissions(PE)/hr

Applicable Compliance Method:

To determine the actual worst case emission rate for particulate emissions, the following equation shall be used:

$$PE = \text{maximum coating solids usage rate (in pounds per hour)} \times (1-TE) \times (1-CE)$$

Where,

PE = particulate emission rate (lb/hr)

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

- 2.c** Emission Limitation:
20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

U.S.EPA Method 9, if required

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: P-23 (R026)
Activity Description: PAINT SPRAY BOOTH

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth P - 23	OAC rule 3745-21-07 (G)(2)	8 lb organic compounds (OC) per hour and 40 lbs OC per day for any day when a photochemically reactive material (coating or cleanup material) is employed.
	OAC rule 3745-17-07 (A)(1)	20 % opacity, as a six-minute average, except as provided by the rule.
	OAC rule 3745-17-11 (B)(1)	0.551 lb particulate emissions (PE) per hour
	OAC rule 3745-31-05 (A)(3) (PTI # 17-039)	The requirements established pursuant to OAC rule 3745-31-05 (A)(3) are equivalent to the requirements established pursuant to OAC rules 3745-21-07(G)(2), 3745-17-07 (A)(1), and 3745-17-11 (B)(1).

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The permittee shall operate a dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 17-039, issued on December 31, 1979, and modified on March 21, 1990: A.III.2. and A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall collect and record the following information each day a photochemically reactive material (coating or cleanup material) is employed in this emissions unit.
 - 2.a The company identification for each coating and photochemically reactive cleanup material employed.
 - 2.b The number of gallons of each coating and photochemically reactive cleanup material employed.
 - 2.c The organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon.
 - 2.d The total organic compound emission rate for all coatings and photochemically reactive cleanup materials, calculated as the sum of (b) x (c) for all coatings and photochemically reactive cleanup materials employed, in pounds per day.
 - 2.e The total number of hours the emissions unit was in operation.
 - 2.f The average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, calculated as (d) / (e), in pounds per hour.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive" is based upon OAC rule 3745-21-01(C)(5).]

3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 17-039, issued on December 31, 1979, and modified on March 21, 1990: A.IV.2., A.IV.3., A.IV.4., and A.IV.5. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit quarterly deviation (excursion) reports that identify each day a photochemically reactive material was employed in this emissions unit and the hourly mass emission limitation was exceeded.
3. The permittee shall submit quarterly deviation (excursion) reports that identify each day a photochemically reactive material was employed in this emissions unit and the daily mass emissions limitation was exceeded.
4. The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c. of this permit.
5. The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any daily record showing that the dry filtration system was 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 Northeast District Office of the Ohio EPA) within 45 days after the exceedance occurs.

V. Testing Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #17 - 039, issued on December 31, 1979, and modified on March 21, 1990: A.V.2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
2. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

- 2.a** Emission Limitation
8 pounds OC per hour and 40 pounds OC per day for any day when a photochemically reactive material (coating or cleanup material) is used

Applicable Compliance Method

Compliance shall be determined by daily record keeping of coating usage, organic compound content of each coating, and operating hours per day for each unit. Formulation data or USEPA Method 24 (for coatings) shall be used to determine the organic compound contents of the coatings and cleanup materials.

- 2.b** Emission Limitation:
0.551 lb particulate emissions(PE)/hr

Applicable Compliance Method:

To determine the actual worst case emission rate for particulate emissions, the following equation shall be used:

$$PE = \text{maximum coating solids usage rate (in pounds per hour)} \times (1-TE) \times (1-CE)$$

Where,

PE = particulate emission rate (lb/hr)

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

- 2.c** Emission Limitation:
20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:
U.S.EPA Method 9, if required

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: P-24 (R027)
Activity Description: PAINT SPRAY BOOTH

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth P - 24	OAC rule 3745-21-07 (G)(2)	8 lb OC per hour and 40 lbs OC per day for any day when a photochemically reactive material (coating or cleanup material) is used.
	OAC rule 3745-17-07 (A)(1)	20 % opacity, as a six-minute average, except as provided by the rule.
	OA rule 3745-17-11 (B)	0.551 lb particulate emissions (PE) per hour
	OAC rule 3745-31-05 (A)(3) (PTI # 17-039)	The requirements established pursuant to OAC rule 3745-31-05 (A)(3) are equivalent to the requirements established pursuant to OAC rules 3745-21-07(G)(2), 3745-17-07 (A)(1), and 3745-17-11 (B)(1).

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The permittee shall operate a dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 17-039, issued on December 31, 1979, and modified on March 21, 1990: A.III.2. and A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall collect and record the following information each day a photochemically reactive material (coating or cleanup material) is employed in this emissions unit.
 - 2.a The company identification for each coating and photochemically reactive cleanup material employed.
 - 2.b The number of gallons of each coating and photochemically reactive cleanup material employed.
 - 2.c The organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon.
 - 2.d For each day during which a photochemically reactive material is employed, the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, calculated as the sum of (b) x (c) for all coatings and photochemically reactive cleanup materials employed, in pounds per day.
 - 2.e The total number of hours the emissions unit was in operation.
 - 2.f The average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, calculated as (d) / (e), in pounds per hour.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive" is based upon OAC rule 3745-21-01(C)(5).]

3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 17-039, issued on December 31, 1979, and modified on March 21, 1990: A.IV.2., A.IV.3., A.IV.4., and A.IV.5. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit quarterly deviation (excursion) reports that identify each day a photochemically reactive material was employed in this emissions unit and the hourly mass emissions limitation was exceeded.
3. The permittee shall submit quarterly deviation (excursion) reports that identify each day a photochemically reactive material was employed in this emissions unit and the daily mass emissions limitation was exceeded.
4. The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c. of this permit.
5. The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any daily record showing that the dry filtration system was 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 Northeast District Office of the Ohio EPA) within 45 days after the exceedance occurs.

V. Testing Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #17-039, issued on December 31, 1979, and modified on March 21, 1990: A.V.2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
2. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

- 2.a** Emission Limitation
8 pounds OC per hour and 40 pounds OC per day for any day when a photochemically reactive material (coating or cleanup material) is used

Applicable Compliance Method

Compliance shall be determined by daily record keeping specified in A.III.2. Formulation data or USEPA Method 24 (for coatings) shall be used to determine the organic compound contents of the coatings and cleanup materials.

- 2.b** Emission Limitation:
0.551 lb particulate emissions(PE)/hr

Applicable Compliance Method:

To determine the actual worst case emission rate for particulate emissions, the following equation shall be used:

$$PE = \text{maximum coating solids usage rate (in pounds per hour)} \times (1-TE) \times (1-CE)$$

Where,

PE = particulate emission rate (lb/hr)

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

- 2.c** Emission Limitation:
20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

U.S.EPA Method 9, if required

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: P-30A (R028)
Activity Description: PAINT SPRAY BOOTH

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth P - 30A	OAC rule 3745-21-07 (G)(2)	exempt (See A.I.2.a.)
	OAC rule 3745-31-05 (A)(3) (PTI No. 17-351)	7.2 tons OC per year The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07 (A)(3), 3745-17-11 (B)(1), and 3745-21-07 (G)(2).
	OAC rule 3745-17-07 (A)(3)	20 % opacity, as a six-minute average, except as provided by the rule.
	OAC rule 3745-17-11 (B)(1)	0.551 lb particulate emissions (PE) per hour

2. Additional Terms and Conditions

- This emissions unit shall not employ any material that is a photochemically reactive material, as defined in OAC rule 3745-21-01 (C).

II. Operational Restrictions

- The permittee shall operate a dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 17-351, issued on October 2, 1985: A.III.2., A.III.3., and A.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
- The permittee shall collect and record the following information on a monthly basis for this emissions unit.

III. Monitoring and/or Record Keeping Requirements (continued)

- 2.a** The company identification for each coating and cleanup material employed.
- 2.b** The number of gallons of each coating and cleanup material employed.
- 2.c** Documentation as to whether or not the material is a photochemically reactive material.
- 2.d** The organic compound content of each coating and cleanup material, in pounds per gallon.
- 2.e** The total organic compound emission rate for all coatings and cleanup materials, calculated as the sum of (b) x (d) for each material employed, in pounds or tons per month.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

- 3.** The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
- 4.** The permittee shall record the annual emissions, in tons per year, calculated as the summation of the monthly emissions from A.III.2.e. divided by 2000.

IV. Reporting Requirements

- 1.** Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 17-351, issued on October 2, 1985: A.IV.2., A.IV.3., and A.IV.4. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
- 2.** The permittee shall submit quarterly deviation (excursion) reports that identify each monthly record that shows a photochemically reactive material was employed in this emissions unit.
- 3.** The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c. of this permit.
- 4.** The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any daily record showing that the dry filtration system was 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 Northeast District Office of the Ohio EPA) within 45 days after the exceedance occurs.

V. Testing Requirements

- 1.** Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 17-351, issued on October 2, 1985: A.V.2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
- 2.** Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

2.a Emission Limitation:
0.551 lb particulate emissions(PE)/hr

Applicable Compliance Method:

To determine the actual worst case emission rate for particulate emissions, the following equation shall be used:

$$PE = \text{maximum coating solids usage rate (in pounds per hour)} \times (1-TE) \times (1-CE)$$

Where,

PE = particulate emission rate (lb/hr)

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

2.b Emission Limitation:
20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

U.S.EPA Method 9, if required by the Ohio EPA

2.c Emission Limitation:
7.2 tons OC per year

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements as specified in A.III.4., calculated as the sum of the 12 monthly emission rates for the calendar year. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials.

2.d Emission Limitation:
This emissions unit shall not employ any material that is a photochemically reactive material.

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements as specified in term A.III.2.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: P-30B (R029)
Activity Description: PAINT SPRAY BOOTH

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth P - 30B	OAC rule 3745-21-07 (G)(2)	exempt (See A.I.2.a.)
	OAC rule 3745-31-05 (A)(3) (PTI # 17-351)	7.2 tons organic compounds (OC) per year The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07 (A)(3), 3745-17-11 (B)(1), and 3745-21-07 (G)(2).
	OAC rule 3745-17-07 (A)(1)	20 % opacity, as a six-minute average, except as provided by the rule.
	OAC rule 3745-17-11 (B)(1)	0.551 lb particulate emissions (PE) per hour

2. Additional Terms and Conditions

- This emissions unit shall not employ any material that is a photochemically reactive material, as defined in OAC rule 3745-21-01 (C).

II. Operational Restrictions

- The permittee shall operate a dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 17-351, issued on October 2, 1985: A.III.2., A.III.3., and A.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
- The permittee shall collect and record the following information on a monthly basis for this emissions unit.

III. Monitoring and/or Record Keeping Requirements (continued)

- 2.a The company identification for each coating and cleanup material employed.
- 2.b The number of gallons of each coating and cleanup material employed.
- 2.c Documentation as to whether or not each material is a photochemically reactive material.
- 2.d The organic compound content of each coating and cleanup material, in pounds per gallon.
- 2.e The total organic compound emission rate for all coatings and cleanup materials, calculated as the sum of (b) x (d) for each material employed, in pounds or tons per month.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

- 3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
- 4. The permittee shall record the annual emissions, in tons per year, calculated as the summation of the monthly emissions from A.III.2.e. divided by 2000.

IV. Reporting Requirements

- 1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 17-351, issued on October 2, 1985: A.IV.2., A.IV.3., and A.IV.4. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
- 2. The permittee shall submit quarterly deviation (excursion) reports that identify each monthly record that shows a photochemically reactive material was employed in this emissions unit.
- 3. The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c. of this permit.
- 4. The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any daily record showing that the dry filtration system was 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 Northeast District Office of the Ohio EPA) within 45 days after the exceedance occurs.

V. Testing Requirements

- 1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 17-351, issued on October 2, 1985: A.V.2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
- 2. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - 2.a Emission Limitation:
This emissions unit shall not employ any material that is a photochemically reactive material.

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements as specified in term A.III.2.

V. Testing Requirements (continued)

- 2.b** Emission Limitation
7.2 tons OC per year

Applicable Compliance Method

Compliance shall be determined based upon the record keeping specified in A.III.2. and A.III.4. Each January the monthly records beginning with the previous January and ending with the previous December shall be summed to determine the annual emissions. Formulation data or US EPA Method 24 for (coatings) shall be used to determine the organic compound content of the coatings and cleanup materials.

- 2.c** Emission Limitation:
0.551 lb particulate emissions(PE)/hr

Applicable Compliance Method:

To determine the actual worst case emission rate for particulate emissions, the following equation shall be used:

$$PE = \text{maximum coating solids usage rate (in pounds per hour)} \times (1-TE) \times (1-CE)$$

Where,

PE = particulate emission rate (lb/hr)

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

- 2.d** Emission Limitation:
20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:
U.S.EPA Method 9, if required

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: P-30C (R030)
Activity Description: PAINT SPRAY BOOTH

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth P - 30C	OAC rule 3745-21-07 (G)(2)	exempt (See A.I.2.a.)
	OAC rule 3745-31-05 (A)(3) (PTI # 17-351)	1.3 tons organic compounds (OC) per year The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07 (A)(3), 3745-17-11 (B)(1), and 3745-21-07 (G)(2).
	OAC rule 3745-17-07 (A)(1)	20 % opacity, as a six-minute average, except as provided by the rule.
	OAC rule 3745-17-11 (B)(1)	0.551 lb particulate emissions (PE) per hour

2. Additional Terms and Conditions

- This emissions unit shall not employ any material that is a photochemically reactive material, as defined in OAC rule 3745-21-01 (C).

II. Operational Restrictions

- The permittee shall operate a dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 17-351, issued on October 2, 1985: A.III.2. and A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
- The permittee shall collect and record the following information on a monthly basis for this emissions unit.

III. Monitoring and/or Record Keeping Requirements (continued)

- 2.a The company identification for each coating and cleanup material employed.
- 2.b The number of gallons of each coating and cleanup material employed.
- 2.c Documentation as to whether or not each material is a photochemically reactive material.
- 2.d The organic compound content of each coating and cleanup material, in pounds per gallon.
- 2.e The total organic compound emission rate for all coatings and cleanup materials, calculated as the sum of (b) x (d) for each material employed, in pounds or tons per month.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

- 3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
- 4. The permittee shall record the annual emissions, in tons per year, calculated as the sum the monthly emissions from A.III.2.e. divided by 2000.

IV. Reporting Requirements

- 1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 17-351, issued on October 2, 1985: A.IV.2., A.IV.3., and A.IV.4. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
- 2. The permittee shall submit quarterly deviation (excursion) reports that identify each monthly record that shows a photochemically reactive material was employed in this emissions unit.
- 3. The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c. of this permit.
- 4. The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any daily record showing that the dry filtration system was 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 Northeast District Office of the Ohio EPA) within 45 days after the exceedance occurs.

V. Testing Requirements

- 1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 17-351, issued on October 2, 1985: A.V.2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
- 2. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - 2.a Emission Limitation:
This emissions unit shall not employ any material that is a photochemically reactive material.

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements as specified in term A.III.2.

V. Testing Requirements (continued)

- 2.b** Emission Limitation
1.3 tons OC per year

Applicable Compliance Method

Compliance shall be determined based upon the record keeping specified in A.III.2. and A.III.4. Each January the monthly records beginning with the previous January and ending with the previous December shall be added together to determine the annual emissions. Manufacturer's data or US EPA Method 24 (for coatings) shall be used to determine the organic compound content of the coatings and cleanup materials.

- 2.c** Emission Limitation:
0.551 lb particulate emissions(PE)/hr

Applicable Compliance Method:

To determine the actual worst case emission rate for particulate emissions, the following equation shall be used:

$$PE = \text{maximum coating solids usage rate (in pounds per hour)} \times (1-TE) \times (1-CE)$$

Where,

PE = particulate emission rate (lb/hr)

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

- 2.d** Emission Limitation:
20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:
U.S.EPA Method 9, if required

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: P-31 (R031)
Activity Description: PAINT SPRAY BOOTH

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth P - 31	OAC rule 3745-21-07 (G)(2)	exempt (See A.I.2.a.)
	OAC rule 3745-31-05 (A)(3) (PTI # 17-351)	2.1 tons organic compounds (OC) per year The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07 (A)(3), 3745-17-11 (B)(1), and 3745-21-07 (G)(2).
	OAC rule 3745-17-07 (A)(1)	20 % opacity, as a six-minute average, except as provided by the rule.
	OAC rule 3745-17-11 (B)(1)	0.551 lb particulate emissions (PE) per hour

2. Additional Terms and Conditions

- 2.a** This emissions unit shall not employ any material that is a photochemically reactive material, as defined in OAC rule 3745-21-01 (C).

II. Operational Restrictions

- The permittee shall operate a dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 17-351, issued on October 2, 1985: A.III.2., A.III.3., and A.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
- The permittee shall collect and record the following information on a monthly basis for this emissions unit.

III. Monitoring and/or Record Keeping Requirements (continued)

- 2.a The company identification for each coating and cleanup material employed.
- 2.b The number of gallons of each coating and cleanup material employed.
- 2.c Documentation as to whether or not each material is a photochemically reactive material.
- 2.d The organic compound content of each coating and cleanup material, in pounds per gallon.
- 2.e The total organic compound emission rate for all coatings and cleanup materials, calculated as the sum of (b) x (d) for each material employed, in pounds or tons per month.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

- 3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
- 4. The permittee shall record the annual emissions, in tons per year, calculated as the summation of the monthly emissions from A.III.2.e. divided by 2000.

IV. Reporting Requirements

- 1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 17-351, issued on October 2, 1985: A.IV.2., A.IV.3., and A.IV.4. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
- 2. The permittee shall submit quarterly deviation (excursion) reports that identify each monthly record that shows a photochemically reactive material was employed in this emissions unit.
- 3. The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c. of this permit.
- 4. The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any daily record showing that the dry filtration system was 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 Northeast District Office of the Ohio EPA) within 45 days after the exceedance occurs.

V. Testing Requirements

- 1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 17-351, issued on October 2, 1985: A.V.2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
- 2. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
 - 2.a Emission Limitation:
This emissions unit shall not employ any material that is a photochemically reactive material.

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements as specified in term A.III.2.

V. Testing Requirements (continued)

- 2.b** Emission Limitation
2.1 tons OC per year

Applicable Compliance Method

Compliance shall be determined based upon the record keeping specified in A.III.2. and A.III.4. Each January the monthly records beginning with the previous January and ending with the previous December shall be summed to determine the annual emissions. Formulation data or US EPA Method 24 for (coatings) shall be used to determine the organic compound content of the coatings and cleanup materials.

- 2.c** Emission Limitation:
0.551 lb particulate emissions(PE)/hr

Applicable Compliance Method:

To determine the actual worst case emission rate for particulate emissions, the following equation shall be used:

$$PE = \text{maximum coating solids usage rate (in pounds per hour)} \times (1-TE) \times (1-CE)$$

Where,

PE = particulate emission rate (lb/hr)

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

- 2.d** Emission Limitation:
20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:
U.S.EPA Method 9, if required

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: P-32 (R032)
Activity Description: PAINT SPRAY BOOTH

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth P-32	OAC rule 3745-21-07 (G)(2)	The requirements established pursuant to OAC rule 3745-21-07 (G)(2) are less stringent than the requirements established pursuant to OAC rule 3745-31-05 (A)(3).
	OAC rule 3745-31-05 (A)(3) (PTI # 17-1244)	1.9 lbs organic compounds (OC) per hour and 6.0 tons OC per year, including cleanup
		The permittee shall employ only water based coatings with OC contents less than or equal to 2.4 lbs OC per gallon, as applied.
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07 (A)(1) and 3745-17-11 (B)(1).
	OAC rule 3745-17-07 (A)(1)	20 % opacity, as a six-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)(1)	0.551 lb particulate emissions (PE) per hour

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The permittee shall operate a dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 17-1244, issued on December 28, 1995: A.III.2., A.III.3., A.III.4., and A.III.5. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permittee shall collect and record the following information each month to determine compliance with the OC content limitation for this emissions unit.
 - 2.a The name and identification number of each coating, as applied.
 - 2.b The OC content of each coating, as applied, in pounds per gallon excluding water and exempt solvents.
3. The permittee shall collect and record the following information each day to determine compliance with the hourly and annual OC emission limitations for this emissions unit.
 - 3.a The company identification for each coating and cleanup material employed.
 - 3.b The number of gallons of each coating and cleanup material employed.
 - 3.c The organic compound content of each coating and cleanup material, as employed, in pounds per gallon.
 - 3.d The total organic compound emission rate for all coatings and cleanup materials, calculated as the sum of (b) x (c) for all coatings and cleanup materials employed, in pounds per day.
 - 3.e The total number of hours the emissions unit was in operation.
 - 3.f The average hourly organic compound emission rate for all coatings and cleanup materials, calculated as (d)/(e), in average pounds per hour.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]
4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
5. The permittee shall record the annual emissions, in tons per year, calculated as the summation of the daily emissions from A.III.3.d. divided by 2000.

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 17-1244, issued on December 28, 1995: A.IV.2., A.IV.3., A.IV.4., and A.IV.5. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit quarterly deviation (excursion) reports that identify each monthly record showing the use of any noncomplying coating (i.e., for OC content).
3. The permittee shall submit quarterly deviation (excursion) reports that identify each daily record showing a violation of the hourly mass emission rate.
4. The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c. of this permit.

IV. Reporting Requirements (continued)

5. The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any daily record showing that the dry filtration system was 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 Northeast District Office of the Ohio EPA) within 45 days after the exceedance occurs.

V. Testing Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 17-1244, issued on December 28, 1995: A.V.2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

2. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

2.a Emission Limitation:

Use of water based paints with a maximum OC content of 2.4 lbs/gal, as applied

Applicable Compliance Method:

Compliance shall be determined by record keeping specified in A.III.2. Formulation data or USEPA Method 24 (for coatings) shall be used to determine the organic compound contents of the coatings.

2.b Emission Limitation:

1.9 pounds OC per hour and 6.0 TPY

Applicable Compliance Method:

Compliance shall be determined by the record keeping specified in A.III.3. and A.III.5. Formulation data or USEPA Method 24 (for coatings) shall be used to determine the organic compound contents of the coatings and cleanup materials.

2.c Emission Limitation:

0.551 lb particulate emissions(PE)/hr

Applicable Compliance Method:

To determine the actual worst case emission rate for particulate emissions, the following equation shall be used:

$$PE = \text{maximum coating solids usage rate (in pounds per hour)} \times (1-TE) \times (1-CE)$$

Where,

PE = particulate emission rate (lb/hr)

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

2.d Emission Limitation:

20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

U.S.EPA Method 9, if required

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: V-9 (R033)
Activity Description: PAINT SPRAY BOOTH

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth V-9	OAC rule 3745-21-07 (G)(2)	exempt (See A.1.2.a.)
	OAC rule 3745-17-07 (A)(1)	20 % opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11 (B)(1)	The requirements established pursuant to OAC rule 3745-17-11 (B)(1) are less stringent than the requirements established pursuant to OAC rule 3745-31-05 (A)(3).
	OAC rule 3745-31-05 (A)(3) (PTI # 17-426)	0.21 ton particulate emissions (PE) per year 41.6 tons organic compounds (OC) per year The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07 (A)(3) and 3745-21-07 (G)(2).

2. Additional Terms and Conditions

- 2.a This emissions unit shall not employ any material that is a photochemically reactive material, as defined in OAC rule 3745-21-01 (C).

II. Operational Restrictions

1. The permittee shall operate a dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 17-426, issued on April 8, 1987: A.III.2., A.III.3., and A.III.4. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permittee shall collect and record the following information on a monthly basis for this emissions unit.
 - 2.a The company identification for each coating and cleanup material employed.
 - 2.b The number of gallons of each coating and cleanup material employed.
 - 2.c Documentation as to whether or not each material is a photochemically reactive material.
 - 2.d The organic compound content of each coating and cleanup material, in pounds per gallon.
 - 2.e The total organic compound emission rate for all coatings and cleanup materials, calculated as the sum of (b) x (d) for each material employed, in pounds or tons per month.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
4. The permittee shall record the annual emissions, in tons per year, calculated as the summation of the monthly emissions from A.III.2.e. divided by 2000.

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 17-426, issued on April 8, 1987: A.IV.2., A.IV.3., and A.IV.4. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit quarterly deviation (excursion) reports that identify each monthly record that shows a photochemically reactive material was employed in this emissions unit.
3. The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c. of this permit.
4. The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any monthly record showing that the dry filtration system was 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 Northeast District Office of the Ohio EPA) within 45 days after the exceedance occurs.

V. Testing Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 17-426, issued on April 8, 1987: A.V.2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
2. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

- 2.a** Emission Limitation:
This emissions unit shall not employ any material that is a photochemically reactive material.

Applicable Compliance Method:
Compliance shall be based on the record keeping requirements as specified in term A.III.2.

- 2.b** Emission Limitation:
41.6 tons OC per year

Applicable Compliance Method:
Compliance shall be determined based upon the record keeping specified in A.III.2. and A.III.4. Formulation data or USEPA Method 24 (for coatings) shall be used to determine the organic compound contents of the coatings and cleanup materials.

- 2.c** Emission Limitation:
0.21 ton particulate emissions per year

Applicable Compliance Method:
To determine the actual worst case emission rate for particulate emissions, the following equation shall be used:

$$PE = \text{maximum coating solids usage rate (in tons/year)} \times (1-TE) \times (1-CE)$$

Where,

PE = particulate emission rate (ton/year)

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

- 2.d** Emission Limitation:
20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:
U.S.EPA Method 9, if required

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: P-40 (R034)
Activity Description: PAINT SPRAY BOOTH

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth P-40	OAC rule 3745-21-07 (G)(2)	exempt (See A.II.2.)
	OAC rule 3745-17-11 (B)(1)	0.551 lb particulate emissions (PE) per hour
	OAC rule 3745-17-07 (A)(1)	20 % opacity, as a six-minute average, except as provided by rule
	OAC rule 3745-31-05 (A)(3) (PTI # 17-631)	3.63 lbs of organic compounds per hour
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07 (A)(1), 3745-17-11 (B)(1), and 3745-21-07 (G)(2).

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The permittee shall operate a dry filtration system whenever this emissions unit is in operation.
- The permittee shall not employ any coatings and/or cleanup materials that are photochemically reactive materials, as defined in OAC rule 3745-21-01 (C).

III. Monitoring and/or Record Keeping Requirements

- Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 17-631, issued on November 2, 1988: A.III.2. and A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
- The permittee shall collect and record the following information for each day for this emissions unit.

III. Monitoring and/or Record Keeping Requirements (continued)

- 2.a The company identification for each coating and cleanup material employed.
- 2.b The number of gallons of each coating and cleanup material employed.
- 2.c Documentation as to whether or not each coating and cleanup material is a photochemically reactive material.
- 2.d The organic compound content of each coating and cleanup material, in pounds per gallon.
- 2.e The total organic compound emission rate for all coatings and cleanup materials, calculated as the sum of (b) x (d) for all coatings and cleanup materials, in pounds per day.
- 2.f The total number of hours the emissions unit was in operation.
- 2.g The hourly organic compound emission rate for all coatings and cleanup materials, calculated as (e)/(f), in average pounds per hour.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

- 3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

- 1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 17-631, issued on November 2, 1988: A.IV.2., A.IV.3., A.IV.4., and A.IV.5. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
- 2. The permittee shall submit quarterly deviation (excursion) reports that identify each day that a photochemically reactive material was employed in this emissions unit.
- 3. The permittee shall submit quarterly deviation (excursion) reports that identify each day the hourly mass emission limitation was exceeded.
- 4. The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c. of this permit.
- 5. The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any daily record showing that the dry filtration system was 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 Northeast District Office of the Ohio EPA) within 45 days after the exceedance occurs.

V. Testing Requirements

- 1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 17-631, issued on November 2, 1988: A.V.2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
- 2. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

2.a Emission Limitation:

The permittee shall not employ any coatings and/or cleanup materials that are photochemically reactive materials, as defined in OAC rule 3745-21-01 (C).

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements as specified in term A.III.2.

2.b Emission Limitation:

3.63 pounds OC per hour

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in A.III.2. Formulation data or USEPA Method 24 (for coatings) shall be used to determine the organic compound contents of the coatings and cleanup materials.

2.c Emission Limitation:

0.551 lb particulate emissions(PE)/hr

Applicable Compliance Method:

To determine the actual worst case emission rate for particulate emissions, the following equation shall be used:

$$PE = \text{maximum coating solids usage rate (in pounds per hour)} \times (1-TE) \times (1-CE)$$

Where,

PE = particulate emission rate (lb/hr)

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

2.d Emission Limitation:

20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

U.S.EPA Method 9, if required

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: A-128 (R035)
Activity Description: ADHESIVE SPRAY BOOTH

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth A-128	OAC rule 3745-17-11 (B)(1)	0.551 lb particulate emissions (PE) per hour
	OAC rule 3745-17-07 (A)(1)	20 % opacity, as a six-minute average, except as provided by rule exempt (See A.II.2.)
	OAC rule 3745-21-07 (G)(2)	
	OAC rule 3745-31-05 (A)(3) (PTI # 17-631)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07 (G)(2), 3745-17-07 (A)(1), and 3745-17-11 (B)(1).

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The permittee shall operate a dry filtration system whenever this emissions unit is in operation.
- The permittee shall not employ any coatings and/or cleanup materials that are photochemically reactive materials, as defined in OAC rule 3745-21-01 (C).

III. Monitoring and/or Record Keeping Requirements

- Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 17-631, issued on November 2, 1988: A.III.2. and A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
- The permittee shall maintain daily records that indicate whether or not each coating and cleanup material employed in this emissions unit is a photochemically reactive material.
- The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 17-631, issued on November 2, 1988: A.IV.2., A.IV.3., and A.IV.4. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit quarterly deviation (excursion) reports that identify each day a photochemically reactive material was employed in this emissions unit.
3. The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c. of this permit.
4. The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any daily record showing that the dry filtration system was 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 Northeast District Office of the Ohio EPA) within 45 days after the exceedance occurs.

V. Testing Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 17-631, issued on November 2, 1988: A.V.2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
2. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- 2.a** Emission Limitation:
This emissions unit shall not employ any material that is a photochemically reactive material.

Applicable Compliance Method:
Compliance shall be based on the record keeping requirements as specified in term A.III.2.

- 2.b** Emission Limitation:
0.551 lb particulate emissions(PE)/hr

Applicable Compliance Method:
To determine the actual worst case emission rate for particulate emissions, the following equation shall be used:

$$PE = \text{maximum coating solids usage rate (in pounds per hour)} \times (1-TE) \times (1-CE)$$

Where,

PE = particulate emission rate (lb/hr)

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

- 2.c** Emission Limitation:
20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:
U.S.EPA Method 9, if required

Facility Name: **Blackhawk Automotive Plastics, Inc.**
Facility ID: **02-15-09-0195**
Emissions Unit: **A-128 (R035)**

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: P-41 (R036)
Activity Description: ADHESIVE SPRAY BOOTH

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth P-41	OAC rule 3745-17-11 (B)(1)	0.551 lb particulate emissions (PE) per hour
	OAC rule 3745-17-07 (A)(1)	20 % opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-21-07 (G)(2)	exempt (See A.II.2.)
	OAC rule 3745-31-05 (A)(3) (PTI # 17-761)	7.25 pounds organic compounds (OC) per hour
		The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07 (A)(1), 3745-17-11 (B)(1), and 3745-21-07 (G)(2).

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The permittee shall operate a dry filtration system whenever this emissions unit is in operation.
- The permittee shall not employ any coatings and/or cleanup materials that are photochemically reactive materials, as defined in OAC rule 3745-21-01 (C).

III. Monitoring and/or Record Keeping Requirements

- Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 17-1497, issued on May 15, 1996: A.III.2. and A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
- The permittee shall collect and record the following information for each day for this emissions unit.

III. Monitoring and/or Record Keeping Requirements (continued)

- 2.a The company identification for each coating and cleanup material employed.
- 2.b The number of gallons of each coating and cleanup material employed.
- 2.c Documentation as to whether or not each coating and cleanup material is a photochemically reactive material.
- 2.d The organic compound content of each coating and cleanup material, in pounds per gallon.
- 2.e The total organic compound emission rate for all coatings and cleanup materials, calculated as the sum of (b) x (d) for all coatings and cleanup materials, in pounds per day.
- 2.f The total number of hours the emissions unit was in operation.
- 2.g The hourly organic compound emission rate for all coatings and cleanup materials, calculated as (e)/(f), in average pounds per hour.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

- 3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

- 1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 17-1497, issued on May 15, 1996: A.IV.2., A.IV.3., A.IV.4., and A.IV.5. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
- 2. The permittee shall submit quarterly deviation (excursion) reports that identify each day the hourly mass emission limitation was exceeded.
- 3. The permittee shall submit quarterly deviation (excursion) reports that identify each day that a photochemically reactive material was employed in this emissions unit.
- 4. The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c. of this permit.
- 5. The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any daily record showing that the dry filtration system was 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 Northeast District Office of the Ohio EPA) within 45 days after the exceedance occurs.

V. Testing Requirements

- 1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 17-1497, issued on May 15, 1996: A.V.2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
- 2. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

2.a Emission Limitation:

The permittee shall not employ any coatings and/or cleanup materials that are photochemically reactive materials, as defined in OAC rule 3745-21-01 (C).

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements as specified in term A.III.2.

2.b Emission Limitation:

7.25 pounds organic compounds per hour

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in A.III.2. Formulation data or USEPA Method 24 (for coatings) shall be used to determine the organic compound contents of the coatings and cleanup materials.

2.c Emission Limitation:

0.551 lb particulate emissions(PE)/hr

Applicable Compliance Method:

To determine the actual worst case emission rate for particulate emissions, the following equation shall be used:

$$PE = \text{maximum coating solids usage rate (in pounds per hour)} \times (1-TE) \times (1-CE)$$

Where,

PE = particulate emission rate (lb/hr)

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

2.d Emission Limitation:

20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

U.S.EPA Method 9, if required

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: V-10 (R037)
Activity Description: PAINT SPRAY BOOTH

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth V-10	OAC rule 3745-17-11 (B)(1)	0.551 lb particulate emissions (PE) per hour
	OAC rule 3745-17-07 (A)(1)	20 % opacity, as a six-minute average, except as provided by rule
	OAC rule 3745-31-05 (A)(3) (PTI # 17-761)	8 pounds organic compounds per hour and 40 pounds organic compounds per day when photochemically reactive coatings are applied
	OAC rule 3745-21-07 (G)(2)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07 (A)(1) and 3745-17-11 (B)(1). The requirements established pursuant to OAC rule 3745-21-07 (G)(2) are less stringent than the requirements established pursuant to OAC rule 3745-31-05 (A)(3).

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The permittee shall operate a dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 17-1497, issued on May 15, 1996: A.III.2. and A.III.3. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permittee shall collect and record the following information for each day for this emissions unit.
 - 2.a The company identification for each photochemically reactive coating and cleanup material employed.
 - 2.b The number of gallons of each coating and cleanup material employed.
 - 2.c The organic compound content of each coating and cleanup material, in pounds per gallon.
 - 2.d The total organic compound emission rate for all coatings and cleanup materials, calculated as the sum of (b) x (c) for all coatings and cleanup materials, in pounds per day.
 - 2.e The total number of hours the emissions unit was in operation.
 - 2.f The hourly organic compound emission rate for all coatings and cleanup materials, calculated as (d)/(e), in average pounds per hour.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install # 17-1497, issued on May 15, 1996: A.IV.2., A.IV.3., A.IV.4., and A.IV.5. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. The permittee shall submit quarterly deviation (excursion) reports that identify each day the hourly mass emission limitation was exceeded.
3. The permittee shall submit quarterly deviation (excursion) reports that identify each day the daily mass emission limitation was exceeded.
4. The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any daily record showing that the dry filtration system was 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 Northeast District Office of the Ohio EPA) within 45 days after the exceedance occurs.
5. The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c. of this permit.

V. Testing Requirements

1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install # 17-1497, issued on May 15, 1996: A.V.2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

V. Testing Requirements (continued)

2. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

2.a Emission Limitation:
8 pounds organic compounds per hour when photochemically reactive coatings are applied

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in A.III.2. Formulation data or USEPA Method 24 (for coatings) shall be used to determine the organic compound contents of the coatings and cleanup materials.

2.b Emission Limitation:
40 pounds organic compounds per day when photochemically reactive coatings are applied

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping specified in A.III.2. Formulation data or USEPA Method 24 (for coatings) shall be used to determine the organic compound contents of the coatings and cleanup materials.

2.c Emission Limitation:
0.551 lb particulate emissions(PE)/hr

Applicable Compliance Method:

To determine the actual worst case emission rate for particulate emissions, the following equation shall be used:

$$PE = \text{maximum coating solids usage rate (in pounds per hour)} \times (1-TE) \times (1-CE)$$

Where,

PE = particulate emission rate (lb/hr)

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

2.d Emission Limitation:
20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

U.S.EPA Method 9, if required

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: P-42 (R038)
Activity Description: PAINT SPRAY BOOTH

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth P-42	OAC rule 3745-31-05 (A)(3) (PTI # 02-16803)	20.0 lbs volatile organic compounds (VOC) per hour on any day no photochemically reactive materials are employed. 0.34 lb particulate emissions (PE) per hour and 0.52 ton PE per year. See also A.II.1., A.III.2., and A.III.3. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05 (D), 3745-17-07 (A)(1), 3745-17-11 (B)(1), and 3745-21-07 (G)(2).
	OAC rule 3745-31-05 (D)	7.0 tons VOC per rolling 12-months, including cleanup.
	OAC rule 3745-17-07 (A)(1)	20 % opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11 (B)(1)	The requirements of OAC rule 3745-17-11 (B)(1) are less stringent than the requirements established pursuant to OAC rule 3745-31-05 (A)(3).
	OAC rule 3745-21-07 (G)(2)	8 lbs organic compounds (OC) per hour and 40 lbs OC per day, including cleanup, on any day photochemically reactive materials are employed.

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The maximum annual volatile organic material usage* (from inks, coatings and adhesive) for R038 shall not exceed 7.0 tons, based upon a rolling, 12-month summation of the volatile organic material figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of the permit to install, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable, Cumulative VOC Emissions* (Tons)
1	1.2
1 - 2	2.4
1 - 3	3.6
1 - 4	4.0
1 - 5	4.4
1 - 6	4.8
1 - 7	5.2
1 - 8	5.6
1 - 9	6.0
1 - 10	6.4
1 - 11	6.8
1 - 12	7.0

* For the purposes of demonstrating compliance with the annual emission limit, the permittee shall calculate the annual emission limit by assuming 100% of the volatile organic material used is emitted. Volatile organic material used can be calculated by multiplying the VOC content of the materials used by the quantity of material used.

2. After the first 12 calendar months of operation following the issuance of the permit to install, compliance with the rolling 12-month VOC emission limitation shall be based upon the rolling 12-month summations of the monthly emissions of VOC.
3. The permittee shall operate a dry filtration system for this emissions unit whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit.
 - 1.a The company identification for each coating and cleanup material employed.
 - 1.b The number of gallons of each coating and cleanup material employed.
 - 1.c The OC content of each coating and cleanup material, in pounds per gallon.
 - 1.d The VOC content of each coating and cleanup material, in pounds per gallon.
 - 1.e A determination whether or not each material is a photochemically reactive material.
 - 1.f The total OC emission rate for all coatings and cleanup materials employed, in pounds per day, calculated as the sum of (b) x (c) for each material employed on any day photochemically reactive materials were employed.
 - 1.g The total VOC emission rate for all coatings and cleanup materials employed, in pounds per day, calculated as the sum of (b) x (d) for each material employed on any day only nonphotochemically reactive coatings were employed.
 - 1.h The number of hours this emissions unit operated each day.
 - 1.i The average pounds OC per hour, calculated as (f) / (h).

III. Monitoring and/or Record Keeping Requirements (continued)

- 1.j The average pounds VOC per hour, calculated as (g) / (h).
- 1.k The solids content of each coating employed, in pounds per gallon.
2. The permittee shall maintain monthly records of the following information for this emissions unit.
 - 2.a The total VOC emissions, in tons.
 - 2.b During the first 12 calendar months of operation following the issuance of the permit to install, the cumulative VOC emissions, in tons.
 - 2.c After the first 12 calendar months of operation following the issuance of the permit to install, the rolling 12-month summation of the monthly VOC emissions, in tons.
3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each day when no photochemically reactive materials were employed and the average hourly VOC emissions exceeded 20 pounds.
2. The permittee shall submit quarterly deviation (excursion) reports that identify each day when photochemically reactive materials were employed and the average hourly OC emissions exceeded 8 pounds.
3. The permittee shall submit quarterly deviation (excursion) reports that identify each day when photochemically reactive materials were employed and the daily OC emissions exceeded 40 pounds.
4. The permittee shall submit quarterly deviation (excursion) reports that identify each month the maximum allowable, cumulative VOC emission limitation was exceeded.
5. The permittee shall submit quarterly deviation (excursion) reports that identify each month the rolling 12-month VOC emission limitation was exceeded.
6. The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any daily record showing that the dry filtration system was 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 Northeast District Office of the Ohio EPA) within 45 days after the exceedance occurs.
7. The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c. of this permit.

V. Testing Requirements

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

- 1.a Emission Limitations:
20 pounds VOC per hour, calculated as a daily average, including cleanup, on each day no photochemically reactive materials are employed.

8 lbs OC per hour, calculated as a daily average, and 40 pounds OC per day, including cleanup, on each day any photochemically reactive material (coating or cleanup material) is employed.

Applicable Compliance Method:

Compliance shall be determined based upon record keeping specified in A.III.1. Formulation data or US EPA Method 24 (for coatings) shall be used to determine the VOC/OC contents of the coatings and cleanup materials.

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
7.0 tons VOC per rolling 12-months and the cumulative VOC emissions for the first 12 months of operation

Applicable Compliance Method:

Compliance shall be determined based upon record keeping specified in A.III.2. Formulation data or US EPA Method 24 (for coatings) shall be used to determine the VOC contents of the coatings and cleanup materials.

- 1.c** Emission Limitation:
0.34 lb PE per hour

Applicable Compliance Method:

To determine the actual worst case emission rate for PE, the following equation shall be used:

$$PE = \text{maximum coating solids usage rate (in pounds per hour)} \times (1-TE) \times (1-CE)$$

Where,

PE = particulate emission rate (lb/hr)

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

- 1.d** Emission Limitation:
0.52 ton PE per year

Applicable Compliance Method:

Compliance shall be determined using the equation in Part III.A.V.1.c., where the maximum coating solids usage rate is for the year rather than for an hour, to determine the lbs PE/year. Then, multiply this figure by ton/2000 lbs to determined ton PE/year.

- 1.e** Emission Limitation:
20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, Compliance shall be determined by a visual determination of opacity performed in accordance with U.S.EPA Method 9.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth P-42		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for this emissions unit (R038) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant	TLV (mg/m3)	Maximum Emission Rate (grams/sec)	Predicted 1-Hour Max Ground-Level Conc (ug/m3)	MAGLC (ug/m3)
Toluene	188	1.96	900	4,476
Xylene	434	0.23	132	10,333
Methyl Ethyl Ketone	590	4.55	2,141	14,048
Propylene Glycol				
Monomethyl Ether	369	1.75	846	8,786
Diacetone Alcohol	238	0.22	124	5,667
Methyl Isobutyl Ketone	205	1.24	638	4,880
Diisobutyl Ketone	145	0.53	244	3,452
Butyl Acetate	713	1.57	626	16,976
Heptane	1,639	1.25	797	39,048
Isopropyl Alcohol	983	2.41	1,329	23,405
Acetone	1,187	7.72	3,785	28,286
n-Butyl Alcohol	61	0.53	312	1,452
V M & P Naphtha	1,398	0.50	319	33,304
Stoddard Solvent	572	1.47	817	12,500
2-Butoxy Ethanol	97	2.77	1,320	2,310

III. Monitoring and/or Record Keeping Requirements (continued)

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: P-43 (R039)
Activity Description: PAINT SPRAY BOOTH

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth P-43	OAC rule 3745-31-05 (A)(3) (PTI # 02-16803)	20.0 lbs VOC per hour on any day no photochemically reactive materials are employed. 0.42 lb PE per hour and 0.42 ton PE per year. See also A.II.1., A.III.2., and A.III.3. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05 (D), 3745-17-07 (A)(1), 3745-17-11 (B)(1), and 3745-21-07 (G)(2).
	OAC rule 3745-31-05 (D)	5.0 tons VOC per rolling 12-months, including cleanup.
	OAC rule 3745-17-07 (A)(1)	20 % opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11 (B)(1)	The requirements of OAC rule 3745-17-11 (B)(1) are less stringent than the requirements established pursuant to OAC rule 3745-31-05 (A)(3).
	OAC rule 3745-21-07 (G)(2)	8 lbs OC per hour and 40 lbs OC per day, including cleanup, on any day photochemically reactive materials are employed

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The maximum annual volatile organic material usage* (from inks, coatings and adhesive) for R039 shall not exceed 5.0 tons, based upon a rolling, 12-month summation of the volatile organic material figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of the permit to install, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable, Cumulative VOC Emissions* (Tons)
1	0.75
1 - 2	1.5
1 - 3	2.3
1 - 4	2.6
1 - 5	2.9
1 - 6	3.2
1 - 7	3.5
1 - 8	3.8
1 - 9	4.1
1 - 10	4.4
1 - 11	4.7
1 - 12	5.0

* For the purposes of demonstrating compliance with the annual emission limit, the permittee shall calculate the annual emission limit by assuming 100% of the volatile organic material used is emitted. Volatile organic material used can be calculated by multiplying the VOC content of the materials used by the quantity of material used.

2. After the first 12 calendar months of operation following the issuance of the permit to install, compliance with the rolling 12-month VOC emission limitation shall be based upon the rolling 12-month summations of the monthly emissions of VOC.
3. The permittee shall operate a dry filtration system for this emissions unit whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit.
 - 1.a The company identification for each coating and cleanup material employed.
 - 1.b The number of gallons of each coating and cleanup material employed.
 - 1.c The OC content of each coating and cleanup material, in pounds per gallon.
 - 1.d The VOC content of each coating and cleanup material, in pounds per gallon.
 - 1.e A determination whether or not each material is a photochemically reactive material.
 - 1.f The total OC emission rate for all coatings and cleanup material employed, in pounds per day, calculated as the sum of (b) x (c) for each material employed on any day photochemically reactive materials were employed.
 - 1.g The total VOC emission rate for all coatings and cleanup material employed, in pounds per day, calculated as the sum of (b) x (d) for each material employed on any day only nonphotochemically reactive coatings were employed.
 - 1.h The number of hours this emissions unit operated each day.
 - 1.i The average pounds OC per hour, calculated as (f) / (h).

III. Monitoring and/or Record Keeping Requirements (continued)

- 1.j The average pounds VOC per hour, calculated as (g) / (h).
- 1.k The solids content of each coating employed, in pounds per gallon.
- 2. The permittee shall maintain monthly records of the following information for this emissions unit.
 - 2.a The total VOC emissions, in tons.
 - 2.b During the first 12 calendar months of operation following the issuance of the permit to install, the cumulative VOC emissions, in tons.
 - 2.c After the first 12 calendar months of operation following the issuance of the permit to install, the rolling 12-month summation of the monthly VOC emissions, in tons.
- 3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

- 1. The permittee shall submit quarterly deviation (excursion) reports that identify each day when no photochemically reactive materials were employed and the average hourly VOC emissions exceeded 20 pounds.
- 2. The permittee shall submit quarterly deviation (excursion) reports that identify each day when photochemically reactive materials were employed and the average hourly OC emissions exceeded 8 pounds.
- 3. The permittee shall submit quarterly deviation (excursion) reports that identify each day when photochemically reactive materials were employed and the daily OC emissions exceeded 40 pounds.
- 4. The permittee shall submit quarterly deviation (excursion) reports that identify each month the maximum allowable, cumulative VOC emission limitation was exceeded.
- 5. The permittee shall submit quarterly deviation (excursion) reports that identify each month the rolling 12-month VOC emission limitation was exceeded.
- 6. The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any daily record showing that the dry filtration system was 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 Northeast District Office of the Ohio EPA) within 45 days after the exceedance occurs.
- 7. The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c. of this permit.

V. Testing Requirements

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

- 1.a Emission Limitations:
20 pounds VOC per hour, calculated as a daily average, including cleanup, on each day no photochemically reactive materials are employed.

8 lbs OC per hour, calculated as a daily average, and 40 pounds OC per day, including cleanup, on each day any photochemically reactive material (coating or cleanup material) is employed.

Applicable Compliance Method:

Compliance shall be determined based upon record keeping specified in A.III.1. Formulation data or US EPA Method 24 (for coatings) shall be used to determine the VOC/OC contents of the coatings and cleanup materials.

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
5.0 tons VOC per rolling 12-months and the cumulative VOC emissions for the first 12 months of operation

Applicable Compliance Method:

Compliance shall be determined by summing the emissions determined based upon the record keeping specified in A.III.2. Formulation data or US EPA Method 24 (for coatings) shall be used to determine the VOC contents of the coatings and cleanup materials.

- 1.c** Emission Limitation:
0.42 lb PE per hour

Applicable Compliance Method:

To determine the actual worst case emission rate for PE, the following equation shall be used:

$$PE = \text{maximum coating solids usage rate (in pounds per hour)} \times (1-TE) \times (1-CE)$$

Where,

PE = particulate emission rate (lb/hr)

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

- 1.d** Emission Limitation:
0.42 ton PE per year

Applicable Compliance Method:

Compliance shall be determined using the equation in Part III.A.V.1.c., where the maximum coating solids usage rate is for the year rather than for an hour, to determine the lbs PE/year. Then, multiply this figure by ton/2000 lbs to determined ton PE/year.

- 1.e** Emission Limitation:
20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, Compliance shall be determined by a visual determination of opacity performed in accordance with U.S.EPA Method 9.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth P-43		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for this emissions unit (R039) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant	TLV (mg/m3)	Maximum Emission Rate (grams/sec)	Predicted 1-Hour Max Ground-Level Conc (ug/m3)	MAGLC (ug/m3)
Toluene	188	1.96	900	4,476
Xylene	434	0.23	132	10,333
Methyl Ethyl Ketone	590	4.55	2,141	14,048
Propylene Glycol				
Monomethyl Ether	369	1.75	846	8,786
Diacetone Alcohol	238	0.22	124	5,667
Methyl Isobutyl Ketone	205	1.24	638	4,880
Diisobutyl Ketone	145	0.53	244	3,452
Butyl Acetate	713	1.57	626	16,976
Heptane	1,639	1.25	797	39,048
Isopropyl Alcohol	983	2.41	1,329	23,405
Acetone	1,187	7.72	3,785	28,286
n-Butyl Alcohol	61	0.53	312	1,452
V M & P Naphtha	1,398	0.50	319	33,304
Stoddard Solvent	572	1.47	817	12,500
2-Butoxy Ethanol	97	2.77	1,320	2,310

III. Monitoring and/or Record Keeping Requirements (continued)

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: P-44 (R040)
Activity Description: PAINT SPRAY BOOTH

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth P-44	OAC rule 3745-31-05 (A)(3) (PTI # 02-16803)	20.0 lbs volatile organic compounds (VOC) per hour on any day no photochemically reactive materials are employed. 0.42 lb particulate emissions (PE) per hour and 0.59 ton PE per year. See also A.II.1., A.III.2., and A.III.3. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05 (D), 3745-17-07 (A)(1), 3745-17-11 (B)(1), and 3745-21-07 (G)(2).
	OAC rule 3745-31-05 (D)	7.0 tons volatile organic compounds (VOC) per rolling 12-months, including cleanup.
	OAC rule 3745-17-07 (A)(1)	20 % opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11 (B)(1)	The requirements of OAC rule 3745-17-11 (B)(1) are less stringent than the requirements established pursuant to OAC rule 3745-31-05 (A)(3).
	OAC rule 3745-21-07 (G)(2)	8 lbs OC per hour and 40 lbs OC per day, including cleanup, on any day photochemically reactive materials are employed.

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The maximum annual volatile organic material usage* (from inks, coatings and adhesive) for R040 shall not exceed 7.0 tons, based upon a rolling, 12-month summation of the volatile organic material figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of the permit to install, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable, Cumulative VOC Emissions (Tons)
1	1.2
1 - 2	2.4
1 - 3	3.6
1 - 4	4.0
1 - 5	4.4
1 - 6	4.8
1 - 7	5.2
1 - 8	5.6
1 - 9	6.0
1 - 10	6.4
1 - 11	6.8
1 - 12	7.0

* For the purposes of demonstrating compliance with the annual emission limit, the permittee shall calculate the annual emission limit by assuming 100% of the volatile organic material used is emitted. Volatile organic material used can be calculated by multiplying the VOC content of the materials used by the quantity of material used.

2. After the first 12 calendar months of operation following the issuance of the permit to install, compliance with the rolling 12-month VOC emission limitation shall be based upon the rolling 12-month summations of the monthly emissions of VOC.
3. The permittee shall operate a dry filtration system for this emissions unit whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit.
 - 1.a The company identification for each coating and cleanup material employed.
 - 1.b The number of gallons of each coating and cleanup material employed.
 - 1.c The OC content of each coating and cleanup material, in pounds per gallon.
 - 1.d The VOC content of each coating and cleanup material, in pounds per gallon.
 - 1.e A determination as to whether or not each material is photochemically reactive material.
 - 1.f The total OC emission rate for all coatings and cleanup materials employed in pounds per day, calculated as the sum of (b) x (c) for each material employed on any day photochemically reactive materials were employed.
 - 1.g The total VOC emission rate for all coatings and cleanup materials employed, in pounds per day, calculated as the sum of (b) x (d) for each material employed on any day only nonphotochemically reactive materials were employed.
 - 1.h The number of hours this emissions unit operated each day.
 - 1.i The average pounds OC per hour, calculated as (f) / (h).

III. Monitoring and/or Record Keeping Requirements (continued)

- 1.j The average pounds VOC per hour, calculated as (g) / (h).
- 1.k The solids content of each coating employed, in pounds per gallon.
2. The permittee shall maintain monthly records of the following information for this emissions unit.
 - 2.a The total VOC emissions, in tons.
 - 2.b During the first 12 calendar months of operation following the issuance of the permit to install, the cumulative VOC emissions, in tons.
 - 2.c After the first 12 calendar months of operation following the issuance of the permit to install, the rolling 12-month summation of the monthly VOC emissions, in tons.
3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each day when no photochemically reactive materials were employed and the average hourly VOC emissions exceeded 20 pounds.
2. The permittee shall submit quarterly deviation (excursion) reports that identify each day when photochemically reactive materials were employed and the average hourly OC emissions exceeded 8 pounds.
3. The permittee shall submit quarterly deviation (excursion) reports that identify each day when photochemically reactive materials were employed and the daily OC emissions exceeded 40 pounds.
4. The permittee shall submit quarterly deviation (excursion) reports that identify each month the maximum allowable, cumulative VOC emission limitation was exceeded.
5. The permittee shall submit quarterly deviation (excursion) reports that identify each month the rolling 12-month VOC emission limitation was exceeded.
6. The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any daily record showing that the dry filtration system was 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 Northeast District Office of the Ohio EPA) within 45 days after the exceedance occurs.
7. The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c. of this permit.

V. Testing Requirements

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

- 1.a Emission Limitations:
20 pounds VOC per hour, calculated as a daily average, including cleanup, on each day no photochemically reactive materials are employed.

8 lbs OC per hour, calculated as a daily average, and 40 pounds OC per day, including cleanup, on each day any photochemically reactive material (coating or cleanup material) is employed.

Applicable Compliance Method:

Compliance shall be determined based upon record keeping specified in A.III.1. Formulation data or US EPA Method 24 (for coatings) shall be used to determine the VOC/OC contents of the coatings and cleanup materials.

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
7.0 tons VOC per rolling 12-months and the cumulative VOC emissions for the first 12 months of operation

Applicable Compliance Method:

Compliance shall be determined by summing the emissions determined based upon the record keeping specified in A.III.2. Formulation data or US EPA Method 24 (for coatings) shall be used to determine the VOC contents of the coatings and cleanup materials.

- 1.c** Emission Limitation:
0.42 lb PE per hour

Applicable Compliance Method:

To determine the actual worst case emission rate for PE, the following equation shall be used:

$$PE = \text{maximum coating solids usage rate (in pounds per hour)} \times (1-TE) \times (1-CE)$$

Where,

PE = particulate emission rate (lb/hr)

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

- 1.d** Emission Limitation:
0.59 ton PE per year

Applicable Compliance Method:

Compliance shall be determined using the equation in Part III.A.V.1.c., where the maximum coating solids usage rate is for the year rather than for an hour, to determine the lbs PE/year. Then, multiply this figure by ton/2000 lbs to determined ton PE/year.

- 1.e** Emission Limitation:
20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, Compliance shall be determined by a visual determination of opacity performed in accordance with U.S.EPA Method 9.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth P-44		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for this emissions unit (R040) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant	TLV (mg/m3)	Maximum Emission Rate (grams/sec)	Predicted 1-Hour Max Ground-Level Conc (ug/m3)	MAGLC (ug/m3)
Toluene	188	1.96	900	4,476
Xylene	434	0.23	132	10,333
Methyl Ethyl Ketone	590	4.55	2,141	14,048
Propylene Glycol				
Monomethyl Ether	369	1.75	846	8,786
Diacetone Alcohol	238	0.22	124	5,667
Methyl Isobutyl Ketone	205	1.24	638	4,880
Diisobutyl Ketone	145	0.53	244	3,452
Butyl Acetate	713	1.57	626	16,976
Heptane	1,639	1.25	797	39,048
Isopropyl Alcohol	983	2.41	1,329	23,405
Acetone	1,187	7.72	3,785	28,286
n-Butyl Alcohol	61	0.53	312	1,452
V M & P Naphtha	1,398	0.50	319	33,304
Stoddard Solvent	572	1.47	817	12,500
2-Butoxy Ethanol	97	2.77	1,320	2,310

III. Monitoring and/or Record Keeping Requirements (continued)

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: P-45 (R041)
Activity Description: PAINT SPRAY BOOTH

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth P-45	OAC rule 3745-31-05 (A)(3) (PTI # 02-16803)	20.0 lbs volatile organic compounds (VOC) per hour on any day no photochemically reactive materials are employed. 0.34 lb particulate emissions (PE) per hour and 0.74 ton PE per year. See also A.II.1., A.III.2., and A.III.3. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05 (D), 3745-17-07 (A)(1), 3745-17-11 (B)(1), and 3745-21-07 (G)(2).
	OAC rule 3745-31-05 (D)	10.0 tons VOC per rolling 12-months, including cleanup.
	OAC rule 3745-17-07 (A)(1)	20 % opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11 (B)(1)	The requirements of OAC rule 3745-17-11 (B)(1) are less stringent than the requirements established pursuant to OAC rule 3745-31-05 (A)(3).
	OAC rule 3745-21-07 (G)(2)	8 lbs organic compounds (OC) per hour and 40 lbs OC per day, including cleanup, on any day photochemically reactive materials are employed.

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The maximum annual volatile organic material usage* (from inks, coatings and adhesive) for R041 shall not exceed 10.0 tons, based upon a rolling, 12-month summation of the volatile organic material figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of the permit to install, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable, Cumulative VOC Emissions * (Tons)
1	2.0
1 - 2	3.5
1 - 3	4.5
1 - 4	5.2
1 - 5	5.8
1 - 6	6.4
1 - 7	7.0
1 - 8	7.6
1 - 9	8.2
1 - 10	8.8
1 - 11	9.4
1 - 12	10.0

* For the purposes of demonstrating compliance with the annual emission limit, the permittee shall calculate the annual emission limit by assuming 100% of the volatile organic material used is emitted. Volatile organic material used can be calculated by multiplying the VOC content of the materials used by the quantity of material used.

2. After the first 12 calendar months of operation following the issuance of the permit to install, compliance with the rolling 12-month VOC emission limitation shall be based upon the rolling 12-month summations of the monthly emissions of VOC.
3. The permittee shall operate a dry filtration system for this emissions unit whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit.
 - 1.a The company identification for each coating and cleanup material employed.
 - 1.b The number of gallons of each coating and cleanup material employed.
 - 1.c The OC content of each coating and cleanup material, in pounds per gallon.
 - 1.d The VOC content of each coating and cleanup material, in pounds per gallon.
 - 1.e A determination whether or not each material is a photochemically reactive material.
 - 1.f The total OC emission rate for all coatings and cleanup materials employed, in pounds per day, calculated as the sum of (b) x (c) for each material employed on any day photochemically reactive materials were employed.
 - 1.g The total VOC emission rate for all coatings and cleanup materials employed, in pounds per day, calculated as the sum of (b) x (d) for each material employed on any day only nonphotochemically reactive materials were employed.
 - 1.h The number of hours this emissions unit operated each day.
 - 1.i The average pounds OC per hour, calculated as (f) / (h).

III. Monitoring and/or Record Keeping Requirements (continued)

- 1.j The average pounds VOC per hour, calculated as (g) / (h).
- 1.k The solids content of each coating employed, in pounds per gallon.
2. The permittee shall maintain monthly records of the following information for this emissions unit.
 - 2.a The total VOC emissions, in tons.
 - 2.b During the first 12 calendar months of operation following the issuance of the permit to install, the cumulative VOC emissions, in tons.
 - 2.c After the first 12 calendar months of operation following the issuance of the permit to install, the rolling 12-month summation of the monthly VOC emissions, in tons.
3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each day when no photochemically reactive materials were employed and the average hourly VOC emissions exceeded 20 pounds.
2. The permittee shall submit quarterly deviation (excursion) reports that identify each day when photochemically reactive materials were employed and the average hourly OC emissions exceeded 8 pounds.
3. The permittee shall submit quarterly deviation (excursion) reports that identify each day when photochemically reactive materials were employed and the daily OC emissions exceeded 40 pounds.
4. The permittee shall submit quarterly deviation (excursion) reports that identify each month the maximum allowable, cumulative VOC emission limitation was exceeded.
5. The permittee shall submit quarterly deviation (excursion) reports that identify each month the rolling 12-month VOC emission limitation was exceeded.
6. The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any daily record showing that the dry filtration system was 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 Northeast District Office of the Ohio EPA) within 45 days after the exceedance occurs.
7. The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c. of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following metho(s).

1.a Emission Limitations:

20 pounds VOC per hour, calculated as a daily average, including cleanup, on each day no photochemically reactive materials are employed.

8 lbs OC per hour, calculated as a daily average, and 40 pounds OC per day, including cleanup, on each day any photochemically reactive material (coating or cleanup material) is employed.

Applicable Compliance Method:

Compliance shall be determined based upon record keeping specified in A.III.1. Formulation data or US EPA Method 24 (for coatings) shall be used to determine the VOC/OC contents of the coatings and cleanup materials.

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
10.0 tons VOC per rolling 12-months and the cumulative VOC emissions for the first 12 months of operation

Applicable Compliance Method:

Compliance shall be determined by summing the emissions determined based upon the record keeping specified in A.III.2. Formulation data or US EPA Method 24 (for coatings) shall be used to determine the VOC contents of the coatings and cleanup materials.

- 1.c** Emission Limitation:
0.34 lb PE per hour

Applicable Compliance Method:

To determine the actual worst case emission rate for PE, the following equation shall be used:

$$PE = \text{maximum coating solids usage rate (in pounds per hour)} \times (1-TE) \times (1-CE)$$

Where,

PE = particulate emission rate (lb/hr)

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

- 1.d** Emission Limitation:
0.74 ton PE per year

Applicable Compliance Method:

Compliance shall be determined using the equation in Part III.A.V.1.c., where the maximum coating solids usage rate is for the year rather than for an hour, to determine the lbs PE/year. Then, multiply this figure by ton/2000 lbs to determined ton PE/year.

- 1.e** Emission Limitation:
20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, Compliance shall be determined by a visual determination of opacity performed in accordance with U.S.EPA Method 9.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth P-45		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for this emissions unit (R041) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant	TLV (mg/m3)	Maximum Emission Rate (grams/sec)	Predicted 1-Hour Max Ground-Level Conc (ug/m3)	MAGLC (ug/m3)
Toluene	188	1.96	900	4,476
Xylene	434	0.23	132	10,333
Methyl Ethyl Ketone	590	4.55	2,141	14,048
Propylene Glycol Monomethyl Ether	369	1.75	846	8,786
Diacetone Alcohol Methyl Isobutyl Ketone	238	0.22	124	5,667
Ketone	205	1.24	638	4,880
Diisobutyl Ketone	145	0.53	244	3,452
Butyl Acetate	713	1.57	626	16,976
Heptane	1,639	1.25	797	39,048
Isopropyl Alcohol	983	2.41	1,329	23,405
Acetone	1,187	7.72	3,785	28,286
n-Butyl Alcohol	61	0.53	312	1,452
V M & P Naphtha	1,398	0.50	319	33,304
Stoddard Solvent	572	1.47	817	12,500
2-Butoxy Ethanol	97	2.77	1,320	2,310

III. Monitoring and/or Record Keeping Requirements (continued)

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: P-46 (R042)
Activity Description: PAINT SPRAY BOOTH

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth P-46	OAC rule 3745-31-05 (A)(3) (PTI # 02-16803)	20.0 lbs volatile organic compounds (VOC) per hour on any day no photochemically reactive materials are employed. 0.42 lb particulate emissions (PE) per hour and 0.34 ton PE per year. See also A.II.1., A.III.2., and A.III.3. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05 (D), 3745-17-07 (A)(1), 3745-17-11 (B)(1), and 3745-21-07 (G)(2).
	OAC rule 3745-31-05 (D)	4.0 tons VOC per rolling 12-months, including cleanup.
	OAC rule 3745-17-07 (A)(1)	20 % opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11 (B)(1)	The requirements of OAC rule 3745-17-11 (B)(1) are less stringent than the requirements established pursuant to OAC rule 3745-31-05 (A)(3).
	OAC rule 3745-21-07 (G)(2)	8 lbs organic compounds (OC) per hour and 40 lbs OC per day, including cleanup, on any day photochemically reactive materials are employed.

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The maximum annual volatile organic material usage* (from inks, coatings and adhesive) for R042 shall not exceed 4.0 tons, based upon a rolling, 12-month summation of the volatile organic material figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of the permit to install, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable, Cumulative VOC Emissions * (Tons)
1	0.6
1 - 2	1.2
1 - 3	1.8
1 - 4	2.1
1 - 5	2.4
1 - 6	2.7
1 - 7	3.0
1 - 8	3.2
1 - 9	3.4
1 - 10	3.6
1 - 11	3.8
1 - 12	4.0

* For the purposes of demonstrating compliance with the annual emission limit, the permittee shall calculate the annual emission limit by assuming 100% of the volatile organic material used is emitted. Volatile organic material used can be calculated by multiplying the VOC content of the materials used by the quantity of material used.

2. After the first 12 calendar months of operation following the issuance of the permit to install, compliance with the rolling 12-month VOC emission limitation shall be based upon the rolling 12-month summations of the monthly emissions of VOC.
3. The permittee shall operate a dry filtration system for this emissions unit whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit.
 - 1.a The company identification for each coating and cleanup material employed.
 - 1.b The number of gallons of each coating and cleanup material employed.
 - 1.c The OC content of each coating and cleanup material, in pounds per gallon.
 - 1.d The VOC content of each coating and cleanup material, in pounds per gallon.
 - 1.e A determination whether or not each material is a photochemically reactive material.
 - 1.f The total OC emission rate for all coatings and cleanup material employed, in pounds per day, calculated as the sum of (b) x (c) for each material employed on any day photochemically reactive materials were employed.
 - 1.g The total VOC emission rate for all coatings and cleanup material employed, in pounds per day, calculated as the sum of (b) x (d) for each material employed on any day only nonphotochemically reactive coatings were employed.
 - 1.h The number of hours this emissions unit operated each day.
 - 1.i The average pounds OC per hour, calculated as (f) / (h).

III. Monitoring and/or Record Keeping Requirements (continued)

- 1.j The average pounds VOC per hour, calculated as (g) / (h).
- 1.k The solids content of each coating employed, in pounds per gallon.
2. The permittee shall maintain monthly records of the following information for this emissions unit.
 - 2.a The total VOC emissions, in tons.
 - 2.b During the first 12 calendar months of operation following the issuance of the permit to install, the cumulative VOC emissions, in tons.
 - 2.c After the first 12 calendar months of operation following the issuance of the permit to install, the rolling 12-month summation of the monthly VOC emissions, in tons.
3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each day when no photochemically reactive materials were employed and the average hourly VOC emissions exceeded 20 pounds.
2. The permittee shall submit quarterly deviation (excursion) reports that identify each day when photochemically reactive materials were employed and the average hourly OC emissions exceeded 8 pounds.
3. The permittee shall submit quarterly deviation (excursion) reports that identify each day when photochemically reactive materials were employed and the daily OC emissions exceeded 40 pounds.
4. The permittee shall submit quarterly deviation (excursion) reports that identify each month the maximum allowable, cumulative VOC emission limitation was exceeded.
5. The permittee shall submit quarterly deviation (excursion) reports that identify each month the rolling 12-month VOC emission limitation was exceeded.
6. The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any daily record showing that the dry filtration system was 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 Northeast District Office of the Ohio EPA) within 45 days after the exceedance occurs.
7. The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c. of this permit.

V. Testing Requirements

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

- 1.a Emission Limitations:
20 pounds VOC per hour, calculated as a daily average, including cleanup, on each day no photochemically reactive materials are employed.

8 lbs OC per hour, calculated as a daily average, and 40 pounds OC per day, including cleanup, on each day any photochemically reactive material (coating or cleanup material) is employed.

Applicable Compliance Method:

Compliance shall be determined based upon record keeping specified in A.III.1. Formulation data or US EPA Method 24 (for coatings) shall be used to determine the VOC/OC contents of the coatings and cleanup materials.

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
4.0 tons VOC per rolling 12-months and the cumulative VOC emissions for the first 12 months of operation

Applicable Compliance Method:

Compliance shall be determined by summing the emissions determined based upon the record keeping specified in A.III.2. Formulation data or US EPA Method 24 (for coatings) shall be used to determine the VOC contents of the coatings and cleanup materials.

- 1.c** Emission Limitation:
0.42 lb PE per hour

Applicable Compliance Method:

To determine the actual worst case emission rate for PE, the following equation shall be used:

$$PE = \text{maximum coating solids usage rate (in pounds per hour)} \times (1-TE) \times (1-CE)$$

Where,

PE = particulate emission rate (lb/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids use

CE = control efficiency of the control equipment

- 1.d** Emission Limitation:
0.34 ton PE per year

Applicable Compliance Method:

Compliance shall be determined using the equation in Part III.A.V.1.c., where the maximum coating solids usage rate is for the year rather than for an hour, to determine the lbs PE/year. Then, multiply this figure by ton/2000 lbs to determined ton PE/year.

- 1.e** Emission Limitation:
20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, Compliance shall be determined by a visual determination of opacity performed in accordance with U.S.EPA Method 9.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth P-46		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for this emissions unit (R042) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant	TLV (mg/m3)	Maximum Emission Rate (grams/sec)	Predicted 1-Hour Max Ground-Level Conc (ug/m3)	MAGLC (ug/m3)
Toluene	188	1.96	900	4,476
Xylene	434	0.23	132	10,333
Methyl Ethyl Ketone	590	4.55	2,141	14,048
Propylene Glycol				
Monomethyl Ether	369	1.75	846	8,786
Diacetone Alcohol	238	0.22	124	5,667
Methyl Isobutyl Ketone	205	1.24	638	4,880
Diisobutyl Ketone	145	0.53	244	3,452
Butyl Acetate	713	1.57	626	16,976
Heptane	1,639	1.25	797	39,048
Isopropyl Alcohol	983	2.41	1,329	23,405
Acetone	1,187	7.72	3,785	28,286
n-Butyl Alcohol	61	0.53	312	1,452
V M & P Naphtha	1,398	0.50	319	33,304
Stoddard Solvent	572	1.47	817	12,500
2-Butoxy Ethanol	97	2.77	1,320	2,310

III. Monitoring and/or Record Keeping Requirements (continued)

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: P-47 (R043)
Activity Description: PAINT SPRAY BOOTH

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth P-47	OAC rule 3745-31-05 (A)(3) (PTI No. 02-16803)	20.0 lbs volatile organic compounds (VOC) per hour on any day no photochemically reactive materials are employed. 0.42 lb particulate emissions (PE) per hour and 0.55 ton PE per year. Emissions from the combustion of natural gas in the drying oven shall not exceed the following: .02 lb/hr and .07 TPY of VOC; .01 lb/hr and .05 TPY of PE; .12 lb/hr and .53 TPY of CO; .14 lb/hr and .63 TPY of NOx; and .001 lb/hr and 0.004 TPY of SO2. (See A.I.2.a.) See also A.II.1., A.III.2., and A.III.3. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05 (D), 3745-17-07 (A)(1), 3745-17-11 (B)(1), and 3745-21-07 (G)(2).
	OAC rule 3745-31-05 (D)	6.5 tons VOC per rolling 12-months, including cleanup.
	OAC rule 3745-17-07 (A)(1)	20 % opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11 (B)(1)	The requirements of OAC rule 3745-17-11 (B)(1) are less stringent than the requirements established pursuant to OAC rule 3745-31-05 (A)(3).

**Operations, Property,
and/or Equipment**

**Applicable Rules/
Requirements**

**Applicable Emissions
Limitations/Control
Measures**

OAC rule 3745-21-07 (G)(2)

8 lbs organic compounds (OC) per hour and 40 lbs OC per day, including cleanup, on any day photochemically reactive materials are employed.

2. Additional Terms and Conditions

- 2.a** The allowable emissions for the combustion of natural gas in the drying oven represent the potentials to emit; therefore; there is no need for monitoring, record keeping, and reporting requirements for these allowable emission rates.

II. Operational Restrictions

1. The maximum annual volatile organic material usage* (from inks, coatings and adhesive) for R043 shall not exceed 6.5 tons, based upon a rolling, 12-month summation of the volatile organic material figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of the permit to install, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable, Cumulative VOC Emissions* (Tons)
1	1.0
1 - 2	2.0
1 - 3	3.0
1 - 4	3.4
1 - 5	3.8
1 - 6	4.2
1 - 7	4.6
1 - 8	5.0
1 - 9	5.4
1 - 10	5.8
1 - 11	6.2
1 - 12	6.5

* For the purposes of demonstrating compliance with the annual emission limit, the permittee shall calculate the annual emission limit by assuming 100% of the volatile organic material used is emitted. Volatile organic material used can be calculated by multiplying the VOC content of the materials used by the quantity of material used.

2. After the first 12 calendar months of operation following the issuance of the permit to install, compliance with the rolling 12-month VOC emission limitation shall be based upon the rolling 12-month summations of the monthly emissions of VOC.
3. The permittee shall operate a dry filtration system for this emissions unit whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit.
- 1.a** The company identification for each coating and cleanup material employed.
- 1.b** The number of gallons of each coating and cleanup material employed.

III. Monitoring and/or Record Keeping Requirements (continued)

- 1.c The OC content of each coating and cleanup material, in pounds per gallon.
- 1.d The VOC content of each coating and cleanup material, in pounds per gallon.
- 1.e A determination whether or not each material is a photochemically reactive material.
- 1.f The total OC emission rate for all coatings and cleanup material employed, in pounds per day, calculated as the sum of (b) x (c) for each material employed on any day photochemically reactive materials were employed.
- 1.g The total VOC emission rate for all coatings and cleanup materials employed, in pounds per day, calculated as the sum of (b) x (d) for each material employed on any day only nonphotochemically reactive coatings were employed.
- 1.h The number of hours this emissions unit operated each day.
- 1.i The average pounds OC per hour, calculated as (f) / (h).
- 1.j The average pounds VOC per hour, calculated as (g) / (h).
- 1.k The solids content of each coating employed, in pounds per gallon.
- 2. The permittee shall maintain monthly records of the following information for this emissions unit.
 - 2.a The total VOC emissions, in tons.
 - 2.b During the first 12 calendar months of operation following the issuance of the permit to install, the cumulative VOC emissions, in tons.
 - 2.c After the first 12 calendar months of operation following the issuance of the permit to install, the rolling 12-month summation of the monthly VOC emissions, in tons.
- 3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

- 1. The permittee shall submit quarterly deviation (excursion) reports that identify each day when no photochemically reactive materials were employed and the average hourly VOC emissions exceeded 20 pounds.
- 2. The permittee shall submit quarterly deviation (excursion) reports that identify each day when photochemically reactive materials were employed and the daily OC emissions exceeded 40 pounds.

The permittee shall submit quarterly deviation (excursion) reports that identify each day when photochemically reactive materials were employed and the average hourly OC emissions exceeded 8 pounds.
- 3. The permittee shall submit quarterly deviation (excursion) reports that identify each month the maximum allowable, cumulative VOC emission limitation was exceeded.

The permittee shall submit quarterly deviation (excursion) reports that identify each day when photochemically reactive materials were employed and the daily OC emissions exceeded 40 pounds.
- 4. The permittee shall submit quarterly deviation (excursion) reports that identify each month the rolling 12-month VOC emission limitation was exceeded.

The permittee shall submit quarterly deviation (excursion) reports that identify each month the maximum allowable, cumulative VOC emission limitation was exceeded.

IV. Reporting Requirements (continued)

5. The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any daily record showing that the dry filtration system was 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 Northeast District Office of the Ohio EPA) within 45 days after the exceedance occurs.

The permittee shall submit quarterly deviation (excursion) reports that identify each month the rolling 12-month VOC emission limitation was exceeded.

6. The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c. of this permit.

The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any daily record showing that the dry filtration system was 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 Northeast District Office of the Ohio EPA) within 45 days after the exceedance occurs.

7. The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c. of this permit.

V. Testing Requirements

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

1.a Emission Limitations:

20 pounds VOC per hour, calculated as a daily average, including cleanup, on each day no photochemically reactive materials are employed.

8 lbs OC per hour, calculated as a daily average, and 40 pounds OC per day, including cleanup, on each day any photochemically reactive material (coating or cleanup material) is employed.

Applicable Compliance Method:

Compliance shall be determined based upon record keeping specified in A.III.1. Formulation data or US EPA Method 24 (for coatings) shall be used to determine the VOC/OC contents of the coatings and cleanup materials.

1.b Emission Limitation:

6.5 tons VOC per rolling 12-months and the cumulative VOC emissions for the first 12 months of operation

Applicable Compliance Method:

Compliance shall be determined by summing the emissions determined based upon the record keeping specified in A.III.2. Formulation data or US EPA Method 24 (for coatings) shall be used to determine the VOC contents of the coatings and cleanup materials.

V. Testing Requirements (continued)

1.c Emission Limitation:
0.42 lb PE per hour

Applicable Compliance Method:

To determine the actual worst case emission rate for PE, the following equation shall be used:

$$PE = \text{maximum coating solids usage rate (in pounds per hour)} \times (1-TE) \times (1-CE)$$

Where,

PE = particulate emission rate (lb/hr)

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

1.d Emission Limitation:
0.55 ton PE per year

Applicable Compliance Method:

Compliance shall be determined using the equation in Part III.A.V.1.c., where the maximum coating solids usage rate is for the year rather than for an hour, to determine the lbs PE/year. Then, multiply this figure by ton/2000 lbs to determined ton PE/year.

1.e Emission Limitation:
20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, Compliance shall be determined by a visual determination of opacity performed in accordance with U.S.EPA Method 9.

1.f Emission Limitation:
0.02 lb VOC/hour and 0.07 TPY as products of combustion

Applicable Compliance Method:

To determine the hourly emissions, multiply 1.5 mmBtu/hour x 1 cf/1,050 Btu x emission factor of 11 lb VOC/mmscf*. To determine annual emissions, multiply the hourly emissions x 8,760 hours/year x 1 ton/2000 pounds.

*Emission factor from AP-42, Table 1.4-2, 7/98 edition.

1.g Emission Limitation:
0.01 lb PE/hour and 0.05 TPY as products of combustion

Applicable Compliance Method:

To determine the hourly emissions, multiply 1.5 mmBtu/hour x 1 cf/1,050 Btu x emission factor of 7.6 lb PE/mmscf*. To determine annual emissions, multiply the hourly emissions x 8,760 hours/year x 1 ton/2000 pounds.

*Emission factor from AP-42, Table 1.4-2, 7/98 edition.

V. Testing Requirements (continued)

- 1.h** Emission Limitation:
0.12 lb CO/hour and 0.53 TPY as products of combustion

Applicable Compliance Method:

To determine the hourly emissions, multiply 1.5 mmBtu/hour x 1 cf/1,050 Btu x emission factor of 84 lb CO/mmscf*. To determine annual emissions, multiply the hourly emissions x 8,760 hours/year x 1 ton/2000 pounds.

*Emission factor from AP-42, Table 1.4-1, 7/98 edition.

- 1.i** Emission Limitation:
0.14 lb NOx/hour and 0.63 TPY as products of combustion

Applicable Compliance Method:

To determine the hourly emissions, multiply 1.5 mmBtu/hour x 1 cf/1,050 Btu x emission factor of 100 lb NOx/mmscf*. To determine annual emissions, multiply the hourly emissions x 8,760 hours/year x 1 ton/2000 pounds.

*Emission factor from AP-42, Table 1.4-1, 7/98 edition.

- 1.j** Emission Limitation:
0.001 lb SO₂/hour and 0.004 TPY as products of combustion

Applicable Compliance Method:

To determine the hourly emissions, multiply 1.5 mmBtu/hour x 1 cf/1,050 Btu x emission factor of 0.6 lb SO₂/mmscf*. To determine annual emissions, multiply the hourly emissions x 8,760 hours/year x 1 ton/2000 pounds.

*Emission factor from AP-42, Table 1.4-2, 7/98 edition.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth P-47		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for this emissions unit (R043) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant	TLV (mg/m3)	Maximum Emission Rate (grams/sec)	Predicted 1-Hour Max Ground-Level Conc (ug/m3)	MAGLC (ug/m3)
Toluene	188	1.96	900	4,476
Xylene	434	0.23	132	10,333
Methyl Ethyl Ketone	590	4.55	2,141	14,048
Propylene Glycol				
Monomethyl Ether	369	1.75	846	8,786
Diacetone Alcohol	238	0.22	124	5,667
Methyl Isobutyl Ketone	205	1.24	638	4,880
Diisobutyl Ketone	145	0.53	244	3,452
Butyl Acetate	713	1.57	626	16,976
Heptane	1,639	1.25	797	39,048
Isopropyl Alcohol	983	2.41	1,329	23,405
Acetone	1,187	7.72	3,785	28,286
n-Butyl Alcohol	61	0.53	312	1,452
V M & P Naphtha	1,398	0.50	319	33,304
Stoddard Solvent	572	1.47	817	12,500
2-Butoxy Ethanol	97	2.77	1,320	2,310

III. Monitoring and/or Record Keeping Requirements (continued)

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: P-25 (R044)
Activity Description: PAINT SPRAY BOOTH

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth P-25	OAC rule 3745-31-05 (A)(3) (PTI No. 02-16861)	20.0 lbs volatile organic compounds (VOC) per hour on any day no photochemically reactive materials are employed. 0.16 lb particulate emissions (PE) per hour and 0.09 ton PE per year. See also A.II.1., A.III.2., and A.III.3. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05 (D), 3745-17-07 (A)(1), 3745-17-11 (B)(1), and 3745-21-07 (G)(2).
	OAC rule 3745-31-05 (D)	8.25 tons VOC per rolling 12-months, including cleanup.
	OAC rule 3745-17-07 (A)(1)	20 % opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11 (B)(1)	The requirements of OAC rule 3745-17-11 (B)(1) are less stringent than the requirements established pursuant to OAC rule 3745-31-05 (A)(3).
	OAC rule 3745-21-07 (G)(2)	8 lbs organic compounds (OC) per hour and 40 lbs OC per day, including cleanup, on any day photochemically reactive materials are employed.

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The maximum annual volatile organic material usage* (from inks, coatings and adhesive) for R044 shall not exceed 8.25 tons, based upon a rolling, 12-month summation of the volatile organic material figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the volatile organic material usage levels specified in the following table:

Month(s)	Maximum Allowable, Cumulative VOC Emissions* (Tons)
1	1.3
1 - 2	2.6
1 - 3	3.9
1 - 4	5.2
1 - 5	5.6
1 - 6	6.0
1 - 7	6.4
1 - 8	6.8
1 - 9	7.2
1 - 10	7.6
1 - 11	8.0
1 - 12	8.25

* For the purposes of demonstrating compliance with the annual emission limit, the permittee shall calculate the annual emission limit by assuming 100% of the volatile organic material used is emitted. Volatile organic material used can be calculated by multiplying the VOC content of the materials used by the quantity of material used.

2. After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual volatile organic material usage limitation shall be based upon a rolling, 12-month summation of the volatile organic material usage figures.
3. The permittee shall operate a dry filtration system for this emissions unit whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit.
 - 1.a The company identification for each coating and cleanup material employed.
 - 1.b The number of gallons of each coating and cleanup material employed.
 - 1.c The OC content of each coating and cleanup material, in pounds per gallon.
 - 1.d The VOC content of each coating and cleanup material, in pounds per gallon.
 - 1.e A determination whether or not each material is a photochemically reactive material.
 - 1.f The total OC emission rate for all coatings and cleanup materials employed, in pounds per day, calculated as the sum of (b) x (c) for each material employed on any day photochemically reactive materials were employed.
 - 1.g The total VOC emission rate for all coatings and cleanup materials employed, in pounds per day, calculated as the sum of (b) x (d) for each material employed on any day only nonphotochemically reactive materials were employed.
 - 1.h The number of hours this emissions unit operated each day.
 - 1.i The average pounds OC per hour, calculated as (f) / (h).

III. Monitoring and/or Record Keeping Requirements (continued)

- 1.j The average pounds VOC per hour, calculated as (g) / (h).
- 1.k The solids content of each coating employed, in pounds per gallon.
2. The permittee shall maintain monthly records of the following information for this emissions unit.
 - 2.a The total VOC emissions, in tons.
 - 2.b During the first 12 calendar months of operation following the issuance of the permit to install, the cumulative VOC emissions, in tons.
 - 2.c After the first 12 calendar months of operation following the issuance of the permit to install, the rolling 12-month summation of the monthly VOC emissions, in tons.
3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each day when no photochemically reactive materials were employed and the average hourly VOC emissions exceeded 20 pounds.
2. The permittee shall submit quarterly deviation (excursion) reports that identify each day when photochemically reactive materials were employed and the average hourly OC emissions exceeded 8 pounds.
3. The permittee shall submit quarterly deviation (excursion) reports that identify each day when photochemically reactive materials were employed and the daily OC emissions exceeded 40 pounds.
4. The permittee shall submit quarterly deviation (excursion) reports that identify each month the maximum allowable, cumulative VOC emission limitation was exceeded.
5. The permittee shall submit quarterly deviation (excursion) reports that identify each month the rolling 12-month VOC emission limitation was exceeded.
6. The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any daily record showing that the dry filtration system was 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 Northeast District Office of the Ohio EPA) within 45 days after the exceedance occurs.
7. The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c. of this permit.

V. Testing Requirements

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

- 1.a Emission Limitations:
20 pounds VOC per hour, calculated as a daily average, including cleanup, on each day no photochemically reactive materials are employed.

8 lbs OC per hour, calculated as a daily average, and 40 pounds OC per day, including cleanup, on each day any photochemically reactive material (coating or cleanup material) is employed.

Applicable Compliance Method:

Compliance shall be determined based upon record keeping specified in A.III.1. Formulation data or US EPA Method 24 (for coatings) shall be used to determine the VOC/OC contents of the coatings and cleanup materials.

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
8.25 tons VOC per rolling 12-months and the cumulative VOC emissions for the first 12 months of operation

Applicable Compliance Method:

Compliance shall be determined by summing the emissions determined based upon the record keeping specified in A.III.2. Formulation data or US EPA Method 24 (for coatings) shall be used to determine the VOC contents of the coatings and cleanup materials.

- 1.c** Emission Limitation:
0.16 lb PE per hour

Applicable Compliance Method:

To determine the actual worst case emission rate for PE, the following equation shall be used:

$$PE = \text{maximum coating solids usage rate (in pounds per hour)} \times (1-TE) \times (1-CE)$$

Where,

PE = particulate emission rate (lb/hr)

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

- 1.d** Emission Limitation:
0.09 ton PE per year

Applicable Compliance Method:

Compliance shall be determined using the equation in Part III.A.V.1.c., where the maximum coating solids usage rate is for the year rather than for an hour, to determine the lbs PE/year. Then, multiply this figure by ton/2000 lbs to determined ton PE/year.

- 1.e** Emission Limitation:
20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, Compliance shall be determined by a visual determination of opacity performed in accordance with U.S.EPA Method 9.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth P-25		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for this emissions unit (R044) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant	TLV (mg/m3)	Maximum Emission Rate (grams/sec)	Predicted 1-Hour Max Ground-Level Conc (ug/m3)	MAGLC (ug/m3)
Toluene	188	1.96	900	4,476
Xylene	434	0.23	132	10,333
Methyl Ethyl Ketone	590	4.55	2,141	14,048
Propylene Glycol				
Monomethyl Ether	369	1.75	846	8,786
Diacetone Alcohol	238	0.22	124	5,667
Methyl Isobutyl Ketone	205	1.24	638	4,880
Diisobutyl Ketone	145	0.53	244	3,452
Butyl Acetate	713	1.57	626	16,976
Heptane	1,639	1.25	797	39,048
Isopropyl Alcohol	983	2.41	1,329	23,405
Acetone	1,187	7.72	3,785	28,286
n-Butyl Alcohol	61	0.53	312	1,452
V M & P Naphtha	1,398	0.50	319	33,304
Stoddard Solvent	572	1.47	817	12,500
2-Butoxy Ethanol	97	2.77	1,320	2,310

III. Monitoring and/or Record Keeping Requirements (continued)

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: P-48 (R045)
Activity Description: PAINT SPRAY BOOTH

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth P-48	OAC rule 3745-31-05 (A)(3) (PTI No. 02-16861)	20.0 lbs volatile organic compounds (VOC) per hour on any day no photochemically reactive materials are employed. 0.34 lb particulate emissions (PE) per hour and 0.90 ton PE per year. See also A.II.1., A.III.2., and A.III.3. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05 (D), 3745-17-07 (A)(1), 3745-17-11 (B)(1), and 3745-21-07 (G)(2).
	OAC rule 3745-31-05 (D)	12.18 tons VOC per rolling 12-months, including cleanup.
	OAC rule 3745-17-07 (A)(1)	20 % opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-11 (B)(1)	The requirements of OAC rule 3745-17-11 (B)(1) are less stringent than the requirements established pursuant to OAC rule 3745-31-05 (A)(3).
	OAC rule 3745-21-07 (G)(2)	8 lbs organic compounds (OC) per hour and 40 lbs OC per day, including cleanup, on any day photochemically reactive materials are employed.

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The maximum annual volatile organic material usage* (from inks, coatings and adhesive) for R045 shall not exceed 12.18 tons, based upon a rolling, 12-month summation of the volatile organic material figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the volatile organic material usage levels specified in the following table:

Month(s)	Maximum Allowable, Volatile Organic Material Usage * (Tons)
1	2.0
1 - 2	4.0
1 - 3	6.0
1 - 4	8.0
1 - 5	8.5
1 - 6	9.0
1 - 7	9.5
1 - 8	10.0
1 - 9	10.5
1 - 10	11.0
1 - 11	11.5
1 - 12	12.18

* For the purposes of demonstrating compliance with the annual emission limit, the permittee shall calculate the annual emission limit by assuming 100% of the volatile organic material used is emitted. Volatile organic material used can be calculated by multiplying the VOC content of the materials used by the quantity of material used.

2. After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual volatile organic material usage limitation shall be based upon a rolling, 12-month summation of the volatile organic material usage figures.
3. The permittee shall operate a dry filtration system for this emissions unit whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit.
 - 1.a The company identification for each coating and cleanup material employed.
 - 1.b The number of gallons of each coating and cleanup material employed.
 - 1.c The OC content of each coating and cleanup material, in pounds per gallon.
 - 1.d The VOC content of each coating and cleanup material, in pounds per gallon.
 - 1.e A determination whether or not each material is a photochemically reactive material.
 - 1.f The total OC emission rate for all coatings and cleanup materials employed, in pounds per day, calculated as the sum of (b) x (c) for each material employed on any day photochemically reactive materials were employed.
 - 1.g The total VOC emission rate for all coatings and cleanup materials employed, in pounds per day, calculated as the sum of (b) x (d) for each material employed on any day only nonphotochemically reactive materials were employed.
 - 1.h The number of hours this emissions unit operated each day.
 - 1.i The average pounds OC per hour, calculated as (f) / (h).

III. Monitoring and/or Record Keeping Requirements (continued)

- 1.j The average pounds VOC per hour, calculated as (g) / (h).
- 1.k The solids content of each coating employed, in pounds per gallon.
2. The permittee shall maintain monthly records of the following information for this emissions unit.
 - 2.a The total VOC emissions, in tons.
 - 2.b During the first 12 calendar months of operation following the issuance of the permit to install, the cumulative VOC emissions, in tons.
 - 2.c After the first 12 calendar months of operation following the issuance of the permit to install, the rolling 12-month summation of the monthly VOC emissions, in tons.
3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each day when no photochemically reactive materials were employed and the average hourly VOC emissions exceeded 20 pounds.
2. The permittee shall submit quarterly deviation (excursion) reports that identify each day when photochemically reactive materials were employed and the average hourly OC emissions exceeded 8 pounds.
3. The permittee shall submit quarterly deviation (excursion) reports that identify each day when photochemically reactive materials were employed and the daily OC emissions exceeded 40 pounds.
4. The permittee shall submit quarterly deviation (excursion) reports that identify each month the maximum allowable, cumulative VOC emission limitation was exceeded.
5. The permittee shall submit quarterly deviation (excursion) reports that identify each month the rolling 12-month VOC emission limitation was exceeded.
6. The permittee shall notify the Director (the Northeast District Office of the Ohio EPA) in writing of any daily record showing that the dry filtration system was 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 Northeast District Office of the Ohio EPA) within 45 days after the exceedance occurs.
7. The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c. of this permit.

V. Testing Requirements

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

- 1.a Emission Limitations:
20 pounds VOC per hour, calculated as a daily average, including cleanup, on each day no photochemically reactive materials are employed.

8 lbs OC per hour, calculated as a daily average, and 40 pounds OC per day, including cleanup, on each day any photochemically reactive material (coating or cleanup material) is employed.

Applicable Compliance Method:

Compliance shall be determined based upon record keeping specified in A.III.1. Formulation data or US EPA Method 24 (for coatings) shall be used to determine the VOC/OC contents of the coatings and cleanup materials.

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
12.18 tons VOC per rolling 12-months and the cumulative VOC emissions for the first 12 months of operation

Applicable Compliance Method:

Compliance shall be determined by summing the emissions determined based upon the record keeping specified in A.III.2. Formulation data or US EPA Method 24 (for coatings) shall be used to determine the VOC contents of the coatings and cleanup materials.

- 1.c** Emission Limitation:
0.34 lb PE per hour

Applicable Compliance Method:

To determine the actual worst case emission rate for PE, the following equation shall be used:

$$PE = \text{maximum coating solids usage rate (in pounds per hour)} \times (1-TE) \times (1-CE)$$

Where,

PE = particulate emission rate (lb/hr)

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

- 1.d** Emission Limitation:
0.90 ton PE per year

Applicable Compliance Method:

Compliance shall be determined using the equation in Part III.A.V.1.c., where the maximum coating solids usage rate is for the year rather than for an hour, to determine the lbs PE/year. Then, multiply this figure by ton/2000 lbs to determined ton PE/year.

- 1.e** Emission Limitation:
20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, Compliance shall be determined by a visual determination of opacity performed in accordance with U.S.EPA Method 9.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
spray booth P-48		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for this emissions unit (R045) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant	TLV (mg/m3)	Maximum Emission Rate (grams/sec)	Predicted 1-Hour Max Ground-Level Conc (ug/m3)	MAGLC (ug/m3)
Toluene	188	1.96	900	4,476
Xylene	434	0.23	132	10,333
Methyl Ethyl Ketone	590	4.55	2,141	14,048
Propylene Glycol				
Monomethyl Ether	369	1.75	846	8,786
Diacetone Alcohol	238	0.22	124	5,667
Methyl Isobutyl Ketone	205	1.24	638	4,880
Diisobutyl Ketone	145	0.53	244	3,452
Butyl Acetate	713	1.57	626	16,976
Heptane	1,639	1.25	797	39,048
Isopropyl Alcohol	983	2.41	1,329	23,405
Acetone	1,187	7.72	3,785	28,286
n-Butyl Alcohol	61	0.53	312	1,452
V M & P Naphtha	1,398	0.50	319	33,304
Stoddard Solvent	572	1.47	817	12,500
2-Butoxy Ethanol	97	2.77	1,320	2,310

III. Monitoring and/or Record Keeping Requirements (continued)

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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