

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

3/3/2014

Certified Mail

Michael Wittman
American Trim L.L.C.
1501 West Michigan Street
Sidney, OH 45365-2490

Facility ID: 0575010106
Permit Number: P0115643
County: Shelby

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Ohio Environmental Protection Agency (EPA) Preliminary Proposed Title V permit that was issued in draft form on 1/28/2014. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and Ohio EPA DAPC, Southwest District Office
401 East Fifth Street
Dayton, OH 45402

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments. If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,


Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA DAPC, Southwest District Office



Response to Comments

Facility ID:	0575010106
Facility Name:	American Trim L.L.C.
Facility Description:	American Trim, LLC, Sidney facility manufactures decorative and transportation products for appliance and automotive industries.
Facility Address:	1501 West Michigan Street Sidney, OH 45365-2490 Shelby County
Permit:	P0115643, Title V Permit - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Sidney Daily News on 01/29/2014. The comment period ended on 02/28/2014.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: None

- a. Comment: None
- b. Response: None



PRELIMINARY PROPOSED

Division of Air Pollution Control Title V Permit for American Trim L.L.C.

Facility ID:	0575010106
Permit Number:	P0115643
Permit Type:	Renewal
Issued:	3/3/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Title V Permit
for
American Trim L.L.C.

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Authorization

Facility ID: 0575010106
Facility Description: American Trim, LLC, Sidney facility manufactures decorative and transportation products for appliance and automotive industries.
Application Number(s): A0049104
Permit Number: P0115643
Permit Description: Title V renewal permit for a manufacturer of decorative and transportation products for appliance and automotive industries.
Permit Type: Renewal
Issue Date: 3/3/2014
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0105624

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

American Trim L.L.C.
1501 West Michigan Street
Sidney, OH 45365-2490

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

Ohio EPA DAPC, Southwest District Office
401 East Fifth Street
Dayton, OH 45402
(937)285-6357

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. 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. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Southwest District Office. 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, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director



Preliminary Proposed Title V Permit

American Trim L.L.C.

Permit Number: P0115643

Facility ID: 0575010106

Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
- (1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
 - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
 - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements
 - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. 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 (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
- (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) 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) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submitted scheduled maintenancerequests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

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

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the



probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA DAPC, Southwest District Office. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

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

- (3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Ohio EPA DAPC, Southwest District Office by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally



enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

- (4) 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

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

- (5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Ohio EPA DAPC, Southwest District Office unless otherwise specified.

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

3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance 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). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

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



4. Risk Management Plans

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

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

5. 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))

6. 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))

7. General Requirements

- a) 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 except as provided pursuant to A.16 below.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 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.
- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
 - (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
 - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
 - (3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. 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))

9. 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))



10. 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 standard terms and conditions shall apply to all operating scenarios authorized in this permit.

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

11. 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))

12. 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))

13. 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:
- (1) 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.
 - (2) 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.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) 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 Ohio EPA DAPC, Southwest District Office 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:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) 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 Ohio EPA DAPC, Southwest District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:
- (1) 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.
 - (2) Compliance certifications shall include the following:
 - a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.
 - b. The permittee's current compliance status.



- c. Whether compliance was continuous or intermittent consistent with A.13.d.2.a above.
 - d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.
 - e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
- (3) 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))

14. 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))

15. 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 Ohio EPA DAPC, Southwest District Office 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 Ohio EPA DAPC, Southwest District Office 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))



16. 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))

17. 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 emissions 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.
- 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.

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

18. 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 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)



19. Insignificant Activities or Emissions Levels

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

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

20. 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))

21. 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))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible Official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, no emissions unit identified in this permit that has been certified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:



- a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

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 Ohio EPA DAPC, Southwest District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Southwest District Office. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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, 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.)

25. Records Retention Requirements Under State Law Only

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.

26. 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.

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

27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

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 Ohio EPA DAPC, Southwest District Office 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).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Southwest District Office must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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 by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or
- c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.



30. Submitting Documents Required by this Permit

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Ohio EPA DAPC, Southwest District Office, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.



Preliminary Proposed Title V Permit

American Trim L.L.C.

Permit Number: P0115643

Facility ID: 0575010106

Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.
2. The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.0 tons per year (TPY) for any individual HAP and 22.5 TPY for the combination of all HAPs, based upon rolling, 12-month summations.
3. The permittee shall collect and record the following information each month for this facility:
 - a) the company identification for each HAP-emitting material (i.e., all HAP-containing coatings, clean-up materials, resins, adhesives, potting compounds, plating chemicals, etc.);
 - b) the individual HAP content of each HAP emitting material;
 - c) the total combined HAP content of each HAP emitting material (i.e. sum of individual HAP contents from b);
 - d) the amount of each HAP emitting material employed during the previous calendar month;
 - e) the hours of operation, or other emissions determining rationale, of all HAP-generating sources (e.g., fuel combustion, sanding/grinding operations, plating);
 - f) the total individual HAP emissions from all HAP-emitting materials employed and all HAP-generating sources, in pounds or tons per month;
 - g) the total combined HAP emissions from all HAP emitting materials employed and all HAP-generating sources, in pounds or tons per month;
 - h) the rolling, 12-month summation of individual HAP emissions from all HAP-emitting materials employed and all HAP-generating sources, in tons; and
 - i) the rolling, 12-month summation of total combined HAP emissions from all HAP-emitting materials employed and all HAP-generating sources, in tons.
4. The permittee shall submit quarterly deviation (excursion) reports for the following emissions unit(s) that identify:
 - a) all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - (1) The rolling 12 individual HAP emissions is greater than 9.0 tons from this facility; and
 - (2) The rolling 12 month combined HAP's emissions are greater than 22.5 tons from this facility.
 - b) the probable cause of each deviation (excursion);



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

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

[OAC rule 3745-15-03(B)(1)(b)] and [OAC rule 3745-15-03(C)]

- 5. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit to install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit-to-install or in the SIP approved versions of OAC Chapters 3745-17, and 3745-21:

EU ID	Operations, Property and/or Equipment Description
K053	Powder coating operation
P051	Polishing of metal products
L006	Parts washer, tool room, decorated products side



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American Trim L.L.C.

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C. Emissions Unit Terms and Conditions



1. B001, Bumper 200 AMU

Operations, Property and/or Equipment Description:

Bumper 200 Air Makeup Unit

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Visible PE shall not exceed 10% opacity as a 6-minute average. The particulate emissions shall not exceed 0.020 pound per million Btu of actual heat input. Emission Limitations: 0.09 lb/hr and 0.4 TPY PE 0.21 lb/hr and 0.91 TPY SO ₂ 2.57 lb/hr and 11.26 TPY NO _x 1.02 lb/hr and 4.46 TPY CO 0.13 lb/hr and 0.58 TPY VOC b)(2)a. and b)(2)b, below.
b.	OAC rule 3745-17-07(A)	The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-10(B)(1)	The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).



(2) Additional Terms and Conditions

- a. The "Best Available Technology" (BAT) control requirement for this emissions unit has been determined to be compliance with the terms and conditions of this permit.

[Authority for term 3745-77-07(A)(3)]

- b. The hourly emission limitations were established for purposes to reflect the emission unit's potential to emit. Therefore, no additional monitoring, record keeping or reporting is required to demonstrate compliance with these emission limitations.

[Authority for term 3745-77-07(A)(3)]

c) Operational Restrictions

- (1) The permittee shall burn only natural gas or propane in this emissions unit.

[Authority for term 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas or propane the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for term 3745-77-07(A)(3)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

- a. When a fuel other than natural gas or propane was burned in this emissions unit.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-15-03(B)(1)(a)] and [OAC rule 3745-15-03(C)] and [OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitations:

0.09 lb/hr and 0.4 TPY PE

0.21 lb/hr and 0.91 TPY SO₂



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2.57 lb/hr and 11.26 TPY NO_x

1.02 lb/hr and 4.46 TPY CO

0.13 lb/hr and 0.58 TPY VOC

Applicable Compliance Method:

The hourly allowable emission limitations above were established by multiplying the maximum natural gas or propane usage rate (12.375 mmBtu/hr) by the higher of the emission factors* for each pollutant, from AP-42, Tables 1.4-1, and 1.4-2, revised 7/98 (for natural gas) and Table 1.5-1, revised October 1996 (for propane).

* for NO_x: 0.21 lb NO_x/mmBtu; for CO, 0.08 lb CO/mmBtu; for PE, 0.007 lb PE/mmBtu; for VOC, 0.01 lb VOC/mmBtu; and for SO₂, 0.017 lb SO₂/mmBtu.

If required, compliance with the hourly allowable emission limitations above shall be determined in accordance with the appropriate Methods** of 40 CFR Part 60, Appendix A.

** For NO_x, Methods 1 - 4 and 7; for CO, Methods 1 - 4 and 10; for VOC, Methods 1 - 4 and 25 or 25A, as appropriate; for PE, Methods 1 - 5; and for SO₂, Methods 1 - 4 and 6.

[Authority for term 3745-77-07(C)]

g) Miscellaneous Requirements

(1) None.



2. K006, Coating/Printing Press C-4

Operations, Property and/or Equipment Description:

Coating/Printing press w/ gas-fired oven (C-4)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) b)(1)g., and d)(4).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	3745-31-05(A)(3) (PTI 05-14394)	The Volatile organic compound (VOC) content of the coatings shall not exceed 5.35 pounds per gallon. The emissions from natural gas and propane combustion in the drying ovens shall not exceed the following: 0.413 lb/hr and 1.809 tons/yr nitrogen oxides (NOx) 0.168 lb/hr and 0.736 ton/yr carbon monoxide (CO) 0.01 lb/hr and 0.057 ton/yr filterable particulate emissions (PE) 0.015 lb/hr and 0.067 ton/yr PM10 0.001 lb/hr and 0.005 ton/yr sulfur dioxide (SO2) 0.011 lb/hr and 0.048 ton/yr VOC
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid the requirements of 40 CFR Part 63, Subpart Mmmm)	See section B.2, 3, and 4, above.
c.	OAC rule 3745-31-05(F)	The VOC emissions, for emissions units K005 through K009, combined, shall not exceed 14.87 tons per rolling, 12-month period.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-21-09(U)(2)(e)(iii)	The coatings usage in this emissions unit shall not exceed 10 gallons per day.
e.	OAC rule 3745-17-10(B)	0.02 lbs of PE per mmBtu for Drying oven(s)
f.	OAC rule 3745-17-07(A) (for the drying ovens)	The Visible PE from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
g.	OAC rule 3745-114-01	Ohio Toxic Rule See Section d)(4), below.

(2) Additional Terms and Conditions

- a. The emission limitations for PM10, SO2, NOx, CO and VOC from the combustion of natural gas and/or propane in the drying ovens are established to reflect potentials to emit for this emissions unit. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary to ensure compliance with these limitations.

[Authority for term 3745-77-07(A)(3)]

c) Operational Restrictions

- (1) The permittee shall burn only natural gas and/or propane as fuel in this emissions unit.

[Authority for term 3745-77-07(A)(1)]

- (2) The combined emissions of VOC from emissions units K005 through K009, inclusive, shall not exceed 14.87 tons per rolling, 12-month period, calculated according to the following formula:

$$14.87 \geq \sum_{n=1}^i \left(\frac{(Pi)x(VOCi)}{2000} \right) - \left(\frac{(Rp)x(Po)x(VOCo)}{2000} \right)$$

Where:

Pi = usage of each coating, cleanup, or restoration material in gallons;

VOCi = volatile Organic compound content of each coating, cleanup, or restoration material in pounds VOC per gallon;

Rp =ratio of solvent used on emissions units K005 through K009 (total solvent used on all emissions units - the amount of solvent used on emissions unit K045);



Po =total gallons of recovered solvents less the gallons of solvent recovered from emissions unit K045, for the subject time period; and

VOC_{Co} = VOC content of recovered solvents in pounds of VOC per gallon.

[Authority for term 3745-77-07(A)(1)]

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

- (1) The permittee shall collect and record the following information each day this emissions unit is in operation:
 - a. the name and identification number of each coating employed;
 - b. the volume, in gallons, of each coating employed;
 - c. the total volume, in gallons, of all the coatings employed; and
 - d. the VOC content of each coating employed, in lbs/gallon of coating.

[Authority for term 3745-77-07(A)(3)]

- (2) The permittee shall collect and record the following information each month for emissions units K005 through K009, inclusive, combined:
 - a. the name or identification number for each coating and cleanup/restoration solvent employed;
 - b. the VOC content of each coating and cleanup/restoration solvent material employed, in pounds per gallon, as applied;
 - c. the volume, in gallons, of each coating and cleanup/restoration solvent material employed;
 - d. the VOC emissions, in tons, as determined by the equation in Section c)(2) of these terms and conditions; and
 - e. the rolling, 12-month VOC emissions, in tons.

[Authority for term 3745-77-07(A)(3)]

- (3) For each day during which the permittee burns fuel other than natural gas or propane in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.

[Authority for term 3745-77-07(A)(3)]

- (4) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and



obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials or use of new materials that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

[ORC 3704.03(F)(3)(c) and F(4)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the maximum allowable coatings VOC content of 5.35 pounds per gallon, as applied;
 - b. all exceedances of the rolling, 12-month VOC emission limitation of 14.87 tons (for emissions units K005 through K009, combined); and
 - c. The permittee shall notify the Director (the Ohio EPA, Southwest District Office) of any record showing the use of a fuel other than natural gas or propane in this emissions unit.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-15-03(B)(1)(a)] and [OAC rule 3745-15-03(C)] and [OAC rule 3745-77-07(C)(1)].

- (2) The permittee shall notify the Director any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. A copy of such record shall be sent to the director within forty-five days after the exceedance occurs.

[OAC rule 3745-21-09(B)(3)(e)]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

The VOC content of the coatings shall not exceed 5.35 pounds per gallon of coating.

Applicable Compliance Method:

Compliance with the allowable VOC content limitation above shall be demonstrated through the record keeping requirements as established in d)(1) of this permit.



b. Emission Limitation:

The VOC emissions, for emissions units K005 through K009, combined, shall not exceed 14.87 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be demonstrated through the record keeping requirements established in Section d)(2) of this permit.

c. Operational Restriction:

10 gallons of coatings/day

Applicable Compliance Method:

Compliance with the operational restriction above shall be demonstrated through the record keeping requirements as established in d)(1) of this permit.

d. Emission Limitation:

Visible PE from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

e. Emission Limitations:

i. 0.413 lb/hr and 1.809 tons/yr nitrogen oxides (NO_x)

ii. 0.168 lb/hr and 0.736 ton/yr carbon monoxide (CO)

iii. 0.01 lb/hr and 0.057 ton/yr filterable particulate emissions (PE)

iv. 0.015 lb/hr and 0.067 ton/yr PM₁₀

v. 0.001 lb/hr and 0.005 ton/yr sulfur dioxide (SO₂)

vi. 0.011 lb/hr and 0.048 ton/yr VOC

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly allowable emission limitations above by multiplying the maximum hourly natural gas/propane consumption rate by the appropriate emission factor from USEPA's AP-42.



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If required, the permittee shall demonstrate compliance with the hourly allowable emission limitations above based on the results of emission testing conducted in accordance with the following Methods:

- i. for NO_x, Methods 1 - 4 and 7 of 40 CFR Part 60, Appendix A;
- ii. for CO, Methods 1 - 4 and 10 of 40 CFR Part 60, Appendix A;
- iii. for PE, Methods 1 - 5 of 40 CFR Part 60, Appendix A;
- iv. for PM₁₀, Methods 201 and 202 of 40 CFR Part 60, Appendix A;
- v. for SO₂, Methods 1 - 4 and 10 of 40 CFR Part 60, Appendix A; and
- vi. for VOC, Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

Compliance with the annual allowable emission limitations above shall be ensured as long as compliance with the hourly allowable emission limitations is maintained (the annual allowable limitations were determined by multiplying the hourly allowable limitations by 8760, and then dividing by 2000).

- f. Emission Limitation: Emission Limitation:

0.02 lbs PE per mmBtu for drying oven

Applicable Compliance Method:

Compliance with this limit shall be based upon the requirement for burning only natural gas or propane for this emissions unit.

If required, the permittee shall demonstrate compliance with this emissions limitation through a compliance demonstration performed in accordance with 40 CFR Part 60, Appendix A, Method 1 thru 5.

[Authority for term 3745-77-07(C)]

- (2) Formulation data of or USEPA Method 24 shall be used to determine the VOC content of each coating and cleanup/restoration solvent material.

[Authority for term 3745-77-07(C)]

- g) Miscellaneous Requirements

- (1) None.



3. K008, Coating/Printing Press C-2

Operations, Property and/or Equipment Description:

Coating/Printing Press C-2 (modification)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) b)(1)g., and d)(4).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	3745-31-05(A)(3) (PTI 05-13345)	The Volatile organic compound (VOC) content of the coatings shall not exceed 5.35 pounds per gallon. Emissions from combustion of natural gas and propane in the drying oven shall not exceed the following limits: 0.15 lb/hr and 0.67 TPY NO _x ; 0.08 lb/hr and 0.36 TPY CO; 0.01 lb/hr and 0.03 TPY Filterable PM; 0.02 lb/hr and 0.07 TPY SO ₂ ; and 0.01 lb/hr and 0.02 TPY VOC.
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid the requirements of 40 CFR Part 63, Subpart Mmmm)	See section B.2, 3, and 4, above.
c.	OAC rule 3745-31-05(F)	The VOC emissions, for emissions units K005 through K009, combined, shall not exceed 14.87 tons per rolling, 12-month period.
d.	OAC rule 3745-21-09(U)(2)(e)(iii)	The coatings usage in this emissions unit shall not exceed 10 gallons per day.
e.	OAC rule 3745-17-10(B)	0.02 lb PE per mmBtu for the drying oven



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	OAC rule 3745-17-07(A) (for the drying ovens)	The Visible PE from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
g.	OAC rule 3745-114-01	Ohio Toxic Rule See Section d)(4), below.

(2) Additional Terms and Conditions

- a. The emission limitations for PM10, SO2, NOx, CO and VOC from the combustion of natural gas and/or propane in the drying ovens are established to reflect potentials to emit for this emissions unit. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary to ensure compliance with these limitations.

[Authority for term 3745-77-07(A)(3)]

c) Operational Restrictions

- (1) The permittee shall burn only natural gas and/or propane as fuel in this emissions unit.

[Authority for term 3745-77-07(A)(1)]

- (2) The combined emissions of VOC from emissions units K005 through K009, inclusive, shall not exceed 14.87 tons per rolling, 12-month period, calculated according to the following formula:

$$14.87 \geq \sum_{n=1}^i \left(\frac{(Pi) \times (VOCi)}{2000} \right) - \left(\frac{(Rp) \times (Po) \times (VOCo)}{2000} \right)$$

Where:

Pi = usage of each coating, cleanup, or restoration material in gallons;

VOCi = volatile Organic compound content of each coating, cleanup, or restoration material in pounds VOC per gallon;

Rp = ratio of solvent used on emissions units K005 through K009 (total solvent used on all emissions units - the amount of solvent used on emissions unit K045);

Po = total gallons of recovered solvents less the gallons of solvent recovered from emissions unit K045, for the subject time period; and

VOCo = VOC content of recovered solvents in pounds of VOC per gallon.

[Authority for term 3745-77-07(A)(1)]



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day this emissions unit is in operation:
 - a. the name and identification number of each coating employed;
 - b. the volume, in gallons, of each coating employed;
 - c. the total volume, in gallons, of all the coatings employed; and
 - d. the VOC content of each coating employed, in lbs/gallon of coating.

[Authority for term 3745-77-07(A)(3)]

- (2) The permittee shall collect and record the following information each month for emissions units K005 through K009, inclusive, combined:
 - a. the name or identification number for each coating and cleanup/restoration solvent employed;
 - b. the VOC content of each coating and cleanup/restoration solvent material employed, in pounds per gallon, as applied;
 - c. the volume, in gallons, of each coating and cleanup/restoration solvent material employed;
 - d. the VOC emissions, in tons, as determined by the equation in Section c)(2) of these terms and conditions; and
 - e. the rolling, 12-month VOC emissions, in tons.

[Authority for term 3745-77-07(A)(3)]

- (3) For each day during which the permittee burns fuel other than natural gas or propane in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.

[Authority for term 3745-77-07(A)(3)]

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



e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the maximum allowable coatings VOC content of 5.35 pounds per gallon, as applied;
 - b. all exceedances of the rolling, 12-month VOC emission limitation of 14.87 tons (for emissions units K005 through K009, combined);
 - c. an identification of each month during which the individual HAP emissions from
 - d. The permittee shall notify the Director (the Ohio EPA, Southwest District Office) of any record showing the use of a fuel other than natural gas or propane in this emissions unit.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-15-03(B)(1)(a)] and [OAC rule 3745-15-03(C)] and [OAC rule 3745-77-07(C)(1)].

- (2) The permittee shall notify the Director any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. A copy of such record shall be sent to the director within forty-five days after the exceedance occurs.

[OAC rule 3745-21-09(B)(3)(e)]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

The VOC content of the coatings shall not exceed 5.35 pounds per gallon of coating.

Applicable Compliance Method:

Compliance with the allowable VOC content limitation above shall be demonstrated through the record keeping requirements as established in d)(1) of this permit.
 - b. Emission Limitation:

The VOC emissions, for emissions units K005 through K009, combined, shall not exceed 14.87 tons per rolling, 12-month period.



Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be demonstrated through the record keeping requirements established in Section d)(2) of this permit.

c. Operational Restriction:

10 gallons of coatings/day

Applicable Compliance Method:

Compliance with the operational restriction above shall be demonstrated through the record keeping requirements as established in d)(1) of this permit.

d. Emission Limitation:

Visible PE from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

e. Emission Limitations:

- i. 00.15 lb/hr and 0.67 TPY NO_x;
- ii. 0.08 lb/hr and 0.36 TPY CO;
- iii. 0.01 lb/hr and 0.03 TPY Filterable PM;
- iv. 0.02 lb/hr and 0.07 TPY SO₂; and
- v. 0.01 lb/hr and 0.02 TPY VOC.

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly allowable emission limitations above by multiplying the maximum hourly natural gas/propane consumption rate by the appropriate emission factor from USEPA's AP-42.

If required, the permittee shall demonstrate compliance with the hourly allowable emission limitations above based on the results of emission testing conducted in accordance with the following Methods:

- i. for NO_x, Methods 1 - 4 and 7 of 40 CFR Part 60, Appendix A;
- ii. for CO, Methods 1 - 4 and 10 of 40 CFR Part 60, Appendix A;



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- iii. for PE, Methods 1 - 5 of 40 CFR Part 60, Appendix A;
- iv. for PM₁₀, Methods 201 and 202 of 40 CFR Part 60, Appendix A;
- v. for SO₂, Methods 1 - 4 and 10 of 40 CFR Part 60, Appendix A; and
- vi. for VOC, Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

Compliance with the annual allowable emission limitations above shall be ensured as long as compliance with the hourly allowable emission limitations is maintained (the annual allowable limitations were determined by multiplying the hourly allowable limitations by 8760, and then dividing by 2000).

f. Emission Limitation::

0.02 lbs PE per mmBtu for drying oven

Applicable Compliance Method:

Compliance with this limit shall be based upon the requirement for burning only natural gas or propane for this emissions unit.

If required, the permittee shall demonstrate compliance with this emissions limitation through a compliance demonstration performed in accordance with 40 CFR Part 60, Appendix A, Method 1 thru 5.

[Authority for term 3745-77-07(C)]

- (2) Formulation data of or USEPA Method 24 shall be used to determine the VOC content of each coating and cleanup/restoration solvent material.

[Authority for term 3745-77-07(C)]

g) Miscellaneous Requirements

- (1) None



4. K009, Coating/Printing Press C-1

Operations, Property and/or Equipment Description:

Coating/Printing Press C-1 (modification)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) b)(1)g., and d)(4).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	3745-31-05(A)(3) (PTI 05-13345)	The Volatile organic compound (VOC) content of the coatings shall not exceed 3.5 pounds per gallon. The emissions from natural gas and propane combustion in the drying ovens shall not exceed the following: 0.27 lb/hr and 1.17 TPY NO _x ; 0.14 lb/hr and 0.63 TPY CO; 0.01 lb/hr and 0.06 TPY Filterable PM; 0.03 lb/hr and 0.13 TPY SO ₂ ; and 0.01 lb/hr and 0.04 TPY VOC.
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid the requirements of 40 CFR Part 63, Subpart Mmmm)	See section B.2, 3, and 4, above.
c.	OAC rule 3745-31-05(F)	The VOC emissions, for emissions units K005 through K009, combined, shall not exceed 14.87 tons per rolling, 12-month period.
d.	OAC rule 3745-21-09(U)(1)(c)	The Volatile organic compound (VOC) content of the coatings shall not exceed 3.5 pounds per gallon.
e.	OAC rule 3745-17-10(B)	0.02 lb PE per mmBtu for the drying oven



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	OAC rule 3745-17-07(A) (for the drying ovens)	The Visible PE from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
g.	OAC rule 3745-114-01	Ohio Toxic Rule See Section d)(4), below.

(2) Additional Terms and Conditions

- a. The emission limitations for PM10, SO2, NOx, CO and VOC from the combustion of natural gas and/or propane in the drying ovens are established to reflect potentials to emit for this emissions unit. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary to ensure compliance with these limitations.

[Authority for term 3745-77-07(A)(3)]

c) Operational Restrictions

- (1) The permittee shall burn only natural gas and/or propane as fuel in this emissions unit.

[Authority for term 3745-77-07(A)(1)]

- (2) The combined emissions of VOC from emissions units K005 through K009, inclusive, shall not exceed 14.87 tons per rolling, 12-month period, calculated according to the following formula:

$$14.87 \geq \sum_{n=1}^i \left(\frac{(Pi)x(VOCi)}{2000} \right) - \left(\frac{(Rp)x(Po)x(VOCo)}{2000} \right)$$

Where:

Pi = usage of each coating, cleanup, or restoration material in gallons;

VOCi = volatile Organic compound content of each coating, cleanup, or restoration material in pounds VOC per gallon;

Rp =ratio of solvent used on emissions units K005 through K009 (total solvent used on all emissions units - the amount of solvent used on emissions unit K045);

Po =total gallons of recovered solvents less the gallons of solvent recovered from emissions unit K045, for the subject time period; and

VOCo = VOC content of recovered solvents in pounds of VOC per gallon.

[Authority for term 3745-77-07(A)(1)]



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

- (1) The permittee shall collect and record the following information each day this emissions unit is in operation:
 - a. the name and identification number of each coating employed;
 - b. the volume, in gallons, of each coating employed;
 - c. the total volume, in gallons, of all the coatings employed; and
 - d. the VOC content of each coating employed, in lbs/gallon of coating.

[Authority for term 3745-77-07(A)(3)]

- (2) The permittee shall collect and record the following information each month for emissions units K005 through K009, inclusive, combined:
 - a. the name or identification number for each coating and cleanup/restoration solvent employed;
 - b. the VOC content of each coating and cleanup/restoration solvent material employed, in pounds per gallon, as applied;
 - c. the volume, in gallons, of each coating and cleanup/restoration solvent material employed;
 - d. the VOC emissions, in tons, as determined by the equation in Section c)(2) of these terms and conditions; and
 - e. the rolling, 12-month VOC emissions, in tons.

[Authority for term 3745-77-07(A)(3)]

- (3) For each day during which the permittee burns fuel other than natural gas or propane in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.

[Authority for term 3745-77-07(A)(3)]

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

[ORC 3704.03(F)(3)(c) and F(4)]



e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the rolling, 12-month VOC emission limitation of 14.87 tons (for emissions units K005 through K009, combined);
 - b. The permittee shall notify the Director (the Ohio EPA, Southwest District Office) of any record showing the use of a fuel other than natural gas or propane in this emissions unit.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-15-03(B)(1)(a)] and [OAC rule 3745-15-03(C)] and [OAC rule 3745-77-07(C)(1)].

- (2) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of each daily record showing a daily volume-weighted average greater than 3.5 pounds VOC per gallon, as applied, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 30 days after the exceedance occurs.

[OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

The VOC content of the coatings shall not exceed 3.5 pounds per gallon of coating.

Applicable Compliance Method:

Compliance with the allowable VOC content limitation above shall be demonstrated through the record keeping requirements as established in d)(1) of this permit.
 - b. Emission Limitation:

The VOC emissions, for emissions units K005 through K009, combined, shall not exceed 14.87 tons per rolling, 12-month period.



Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be demonstrated through the record keeping requirements established in Section d)(2) of this permit.

c. Emission Limitation:

Visible PE from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

d. Emission Limitations:

- i. 0.27 lb/hr and 1.17 TPY NO_x;
- ii. 0.14 lb/hr and 0.63 TPY CO;
- iii. 0.01 lb/hr and 0.06 TPY Filterable PM;
- iv. 0.03 lb/hr and 0.13 TPY SO₂; and
- v. 0.01 lb/hr and 0.04 TPY VOC.

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly allowable emission limitations above by multiplying the maximum hourly natural gas/propane consumption rate by the appropriate emission factor from USEPA's AP-42.

If required, the permittee shall demonstrate compliance with the hourly allowable emission limitations above based on the results of emission testing conducted in accordance with the following Methods:

- i. for NO_x, Methods 1 - 4 and 7 of 40 CFR Part 60, Appendix A;
- ii. for CO, Methods 1 - 4 and 10 of 40 CFR Part 60, Appendix A;
- iii. for PE, Methods 1 - 5 of 40 CFR Part 60, Appendix A;
- iv. for PM₁₀, Methods 201 and 202 of 40 CFR Part 60, Appendix A;
- v. for SO₂, Methods 1 - 4 and 10 of 40 CFR Part 60, Appendix A; and
- vi. for VOC, Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.



Compliance with the annual allowable emission limitations above shall be ensured as long as compliance with the hourly allowable emission limitations is maintained (the annual allowable limitations were determined by multiplying the hourly allowable limitations by 8760, and then dividing by 2000).

e. Emission Limitation:

0.02 lbs PE per mmBtu for drying oven

Applicable Compliance Method:

Compliance with this limit shall be based upon the requirement for burning only natural gas or propane for this emissions unit.

If required, the permittee shall demonstrate compliance with this emissions limitation through a compliance demonstration performed in accordance with 40 CFR Part 60, Appendix A, Method 1 thru 5.

[Authority for term 3745-77-07(C)]

- (2) Formulation data of or USEPA Method 24 shall be used to determine the VOC content of each coating and cleanup/restoration solvent material.

[Authority for term 3745-77-07(C)]

g) Miscellaneous Requirements

- (1) None



5. K022, A-Line Screen Presses

Operations, Property and/or Equipment Description:

Printing Coating Line 172 (was 348A) -Modification

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) b)(1)g., and d)(5).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) and (PTI 05-06270)	The emissions from natural gas and propane combustion in the drying ovens shall not exceed the following: 0.71 lb/hr and 3.1 tons/yr NO _x ; 0.38 lb/hr and 1.67 tons/yr CO; 0.04 lb/hr and 0.15 ton/yr PE; 0.08 lb/hr and 0.34 ton/yr SO ₂ ; and 0.03 lb/hr and 0.11 ton/yr VOC.
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid the requirements of 40 CFR Part 63, Subpart M)	See section B.2, 3, and 4, above.
c.	OAC rule 3745-31-05(F)	The Volatile Organic Compound (VOC) emissions from coatings, pan, and cleanup materials shall not exceed 18.895 tons of VOC per rolling 12-month period.
d.	3745-21-09 (U)(2)(f)	VOC content of coatings shall not exceed 5.36 lbs VOC/gallon, minus water and exempt solvents, as applied.
e.	OAC rule 3745-17-10(B)	0.02 lbs PE per mBtu for drying oven.
f.	OAC rule 3745-17-07(A) (for the drying ovens)	The Visible PE from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
g.	OAC rule 3745-114-01	Ohio Toxic Rule See Section d)(5), below See Section d)(5), below.

(2) Additional Terms and Conditions

- a. Pursuant to OAC rule 3745-21-09(U)(2)(f)(ii), the best available technology has been determined to be extreme performance coatings that have a VOC content greater than the limitations of OAC rules 3745-21-09(U)(1)(c).
- b. The emission limitations for PM10, SO2, NOx, CO and VOC from the combustion of natural gas and/or propane in the drying ovens are established to reflect potentials to emit for this emissions unit. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary to ensure compliance with these limitations.

[Authority for term 3745-77-07(A)(3)]

- c. Extreme performance coatings are exempt by BAT determination in this permit and exemption under OAC rule 3745-21-09(U)(2)(f) in this permit from the requirements for extreme performance coatings in OAC rule 3745-21-09(U)(1). If at any time a non-extreme coating is used in this emissions unit, that coating must comply with the requirements of OAC rule 3745-21-09(U)(1).

For the purpose of discontinuing the coating evaluation under section d)(4) of this permit, the VOC content of extreme performance coating used in this emissions unit shall not exceed 3.5 lbs of VOC per gallon, as applied, minus water and exempt solvents.

[Authority for term 3745-77-07(A)(3)]

c) Operational Restrictions

- (1) The permittee shall burn only natural gas and/or propane as fuel in this emissions unit.

[Authority for term 3745-77-07(A)(1)]

- (2) The weight of volatile organic materials applied/used for K022 shall not exceed 18.895 tons per rolling 12 months, calculated using the following formula:

$$18.895 \text{ tons VOC} \geq \sum_{n=1}^i \frac{(Pi) \times (VOCi) \times [1 - (\text{capture} \times DRE)]}{2000 \text{ lbs/ton}} - \frac{(Po) \times (VOCo)}{2000 \text{ lbs/ton}}$$

Where:

P *i* = usage of coating, or pan/cleanup solvent *i* in gallons for the last 12 months;



VOC i = volatile organic compound content of coating i , or pan/cleanup solvent i in pounds VOC per gallon;

P o = recovered pan/cleanup solvent o in gallons for the last 12 months;

VOC o = volatile organic compound content of pan/cleanup materials o in pounds of VOC per gallon;

Capture = the capture efficiency, assume 0%; and

DRE = destruction removal efficiency of any control device, 0% without controls.

[Authority for term 3745-77-07(A)(1)]

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

(1) This facility shall maintain the following monthly records on all coatings and cleanup/pan solvents materials employed in this emissions unit:

- a. the name or identification number of material employed, as applied;
- b. the VOC content of each coating employed, minus water and exempt solvents, as applied;
- c. the VOC content of each cleanup/pan solvent material employed;
- d. the volume of each coating employed, in gallons;
- e. the volume of each cleanup/pan solvent employed, in gallons;
- f. the VOC emissions, in tons, as determined by the equation in Section c)(2) of these terms and conditions; and
- g. the rolling, 12-month VOC emissions, in tons.

[Authority for term 3745-77-07(A)(3)]

(2) If a credit for recovered cleanup/pan solvent material is used to demonstrate compliance and/or used in the calculation of rolling, 12 month emission calculations, the permittee shall maintain the following records for the recovered cleanup/pan solvent material, and the recovery drum or tank serving this emissions unit:

- a. the date recovered materials were first added to the recovery tank/drum and the date the materials from the recovery drum or tank were shipped off site;
- b. the total amount of material collected and shipped for recycle/recovery and/or disposal at an outside facility, in gallons, on the day it is shipped;
- c. record of the VOC content of each cleanup/pan solvent material that is collected for recovery, in pounds per gallon, or a record of the testing results of the VOC content of the material shipped;



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- d. the mass (lbs) of VOC to be credited to the rolling, 12 month emissions summation, from each shipment of recovered material, calculated using the lowest VOC content of any cleanup/pan solvent material recovered, unless a higher VOC content is established from the testing results of the recovered material shipped (i.e., $b \times c$), and the date of each such shipment or record of credit; and
- e. the record of the total amount of VOC emissions (lbs or tons) that may be applied as a credit, for the materials shipped for recycle/recovery and/or disposal at an outside facility, summed from the records of the VOC emission credits (d), for each shipment recorded during the rolling 12 month period.

[Authority for term 3745-77-07(A)(3)]

- (3) For each day during which the permittee burns fuel other than natural gas or propane in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.

[Authority for term 3745-77-07(A)(3)]

- (4) This facility shall, on an ongoing basis, evaluate the availability of an alternate coating and coating method that will reduce the emissions from this source and meet the coating specifications of the desired product. Should an alternate coating and/or coating method become available, as based on the Best Available Technology (BAT) for this type of operation, this facility shall submit a schedule for implementation of the alternate coatings and/or coating method within 30 days of the availability.

This facility shall submit quarterly reports that summarize the evaluation of an alternate coating and coating method which details the following information for each coating and/or coating method evaluated:

- a. The VOC content, in pounds per gallon;
- b. The acceptability;
- c. the reason why the alternative coating does not meet specification, for unacceptable coatings;
- d. The expected reduction in VOC emissions from the utilization of the acceptable alternate coatings; and
- e. The cost of modifying the source to utilize the alternate coatings and/or coating method.

These reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and shall cover the previous calendar quarter (October through December, January through March, April through June, and July through September, respectively).

Once the facility employs coatings in compliance with the requirements of OAC rule 3745-21-09(U)(1) in this source, the evaluation process of alternate coatings and the reporting requirement of this term will be discontinued.



[Authority for term 3745-77-07(A)(3)]

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

[ORC 3704.03(F)(3)(c) and F(4)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the maximum allowable coatings VOC content of 5.36 pounds per gallon, minus water and exempt solvents, as applied;
 - b. all exceedances of the rolling, 12-month VOC emission limitation of 18.895 tons;
 - c. the permittee shall notify the Director (the Ohio EPA, Southwest District Office) of any record showing the use of a fuel other than natural gas or propane in this emissions unit.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-15-03(B)(1)(a)] and [OAC rule 3745-15-03(C)] and [OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall notify the Director (the Ohio EPA, Southwest District Office) in writing of any monthly record showing the use of noncomplying coatings and/or cleanup/pan solvent material. These notifications shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Southwest District Office) within 30 days following the end of the calendar month.

[OAC rule 3745-77-07(C)(1)]

- (3) This facility shall submit quarterly reports that summarize the evaluation of an alternate coating and coating method which details the following information for each coating and/or coating method evaluated:
 - a. the VOC content, in pounds per gallon;
 - b. the acceptability;
 - c. the reason why the alternative coating does not meet specification, for unacceptable coatings;



- d. the expected reduction in VOC emissions from the utilization of the acceptable alternate coatings; and
- e. the cost of modifying the source to utilize the alternate coatings and/or coating method.

These reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and shall cover the previous calendar quarter (October through December, January through March, April through June, and July through September, respectively).

[OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

VOC content of coatings shall not exceed 5.36 lbs VOC/gallon, minus water and exempt solvents, as applied.

Applicable Compliance Method:

Formulation data or USEPA Method 24 shall be used to determine the VOC content of the coatings. The record keeping requirements contained in Section d) shall demonstrate that only materials with these VOC content limitations are applied.

- b. Emission Limitation:

Volatile Organic Compound (VOC) emissions from coatings and cleanup/pan solvents materials employed shall not exceed 18.895 tons VOC per rolling 12 month period.

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be determined through the record keeping requirements as established in Section d)(1) of this permit.

- c. Emission Limitation:

The emissions from natural gas and propane combustion in the drying ovens shall not exceed the following:

0.71 lb/hr and 3.1 tons/yrNO_x;

0.38 lb/hr and 1.67 tons/yr CO;



0.04 lb/hr and 0.15 ton/yr PM;

0.08 lb/hr and 0.34 ton/yr SO₂; and

0.03 lb/hr and 0.11 ton/yr VOC.

Applicable Compliance Method:

Compliance with the limits for natural gas combustion within the drying ovens shall be based upon the emission factors from AP-42 "Compilation of Air Pollutant Emission Factors", Tables 1.4-1 and 1.4-2 (7/98). These emission factors (lb pollutant/mmscf) multiplied by the maximum hourly gas burning capacity of the burners (one at 1.75 mmBtu/hr, one at 1 mmBtu/hr, and six at 0.3125 mmBtu/hr) and times 1 scf/1000 Btu shall be the demonstration of compliance with the hourly limits. Compliance with the ton per year limits are documented by multiplying the calculated hourly limits by 8760 hours in a year and dividing by 2000 pounds.

Compliance with the limits for propane combustion within the drying ovens shall be based upon the emission factors from AP-42 "Compilation of Air Pollutant Emission Factors", Tables 1.5-1 (10/96). These emission factors (lb pollutant/1000 gallons) multiplied by the maximum hourly gas burning capacity of the burners (one at 1.75 mmBtu/hr, one at 1 mmBtu/hr, and six at 0.3125 mmBtu/hr) and divided by the 91.5 MMBtu/1000 gallons shall be the demonstration of compliance with the hourly limits. Compliance with the ton per year limits are documented by multiplying the calculated hourly limits by 8760 hours in a year and dividing by 2000 pounds.

d. Emission Limitation:

0.02 lbs PE per mmBtu for drying oven

Applicable Compliance Method:

Compliance with this limit shall be based upon the requirement for burning only natural gas or propane for this emissions unit.

If required, the permittee shall demonstrate compliance with this emissions limitation through a compliance demonstration performed in accordance with 40 CFR Part 60, Appendix A, Method 1 thru 5.

e. Emission Limitation;

Visible PE from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.



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Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

[Authority for term 3745-77-07(C)]

- (2) Formulation data of or USEPA Method 24 shall be used to determine the VOC content of each coating and cleanup/restoration solvent material.

[Authority for term 3745-77-07(C)]

g) Miscellaneous Requirements

- (1) None.



6. K033, B-Line Screen Presses

Operations, Property and/or Equipment Description:

Department 173 Printing/Coating Line

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) b)(1)g., and d)(5).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 05-06273)	VOC content of cleanup/pan solvent shall not exceed 7.76 pounds per gallon. The emissions from natural gas and propane combustion in the drying ovens shall not exceed the following: 0.62 lb/hr and 2.7 tons/yrNOx; 0.33 lb/hr and 1.45 tons/yr CO; 0.03 lb/hr and 0.13 ton/yr filterable PM; 0.07 lb/hr and 0.30 ton/yr SO2; and 0.02 lb/hr and 0.1 ton/yr VOC.
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid the requirements of 40 CFR Part 63, Subpart Mmmm)	See section B.2, 3, and 4, above.
c.	OAC rule 3745-31-05(F)	The VOC emissions from coatings, pan, and cleanup materials shall not exceed 18.874 tons per rolling 12 month period.
d.	3745-21-09 (U)(2)(f)(ii)	VOC content of coatings shall not exceed 5.36 lbs VOC/gallon, minus water and exempt solvents, as applied.
e.	OAC rule 3745-17-10(B)	0.02 lbs of PE per mmBtu for drying oven.
f.	OAC rule 3745-17-07(A) (for the drying ovens)	The Visible PE from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
g.	OAC rule 3745-114-01	Ohio Toxic Rule See Section d)(5), below.

(2) Additional Terms and Conditions

a. Pursuant to OAC rule 3745-21-09(U)(2)(f)(ii), the best available technology has been determined to be extreme performance coatings that have a VOC content greater than the limitations of OAC rules 3745-21-09(U)(1)(c).

b. The emission limitations for PM10, SO2, NOx, CO and VOC from the combustion of natural gas and/or propane in the drying ovens are established to reflect potentials to emit for this emissions unit. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary to ensure compliance with these limitations.

[Authority for term 3745-77-07(A)(3)]

c. Extreme performance coatings are exempt by BAT determination in this permit and exemption under OAC rule 3745-21-09(U)(2)(f) in this permit from the requirements for extreme performance coatings in OAC rule 3745-21-09(U)(1). If at any time a non-extreme coating is used in this emissions unit, that coating must comply with the requirements of OAC rule 3745-21-09(U)(1).

For the purpose of discontinuing the coating evaluation under section d) of this permit, the VOC content of extreme performance coating used in this emissions unit shall not exceed 3.5 lbs of VOC per gallon, as applied, minus water and exempt solvents.

[Authority for term 3745-77-07(A)(3)]

c) Operational Restrictions

(1) The permittee shall burn only natural gas and/or propane as fuel in this emissions unit.

[Authority for term 3745-77-07(A)(1)]

(2) The weight of volatile organic materials applied/used for K033 shall not exceed 18.874 tons per rolling 12 months, calculated using the following formula:

$$18.874 \text{ tons VOC} \geq \sum_{n=1}^i \frac{(P_i) \times (VOC_i) \times [1 - (\text{capture} \times DRE)]}{2000 \text{ lbs/ton}} - \frac{(P_o) \times (VOC_o)}{2000 \text{ lbs/ton}}$$

Where:

P = usage of coating, or pan/cleanup solvent *i* in gallons for the last 12 months;



VOC i = volatile organic compound content of coating i , or pan/cleanup solvent i in pounds VOC per gallon;

P o = recovered pan/cleanup solvent o in gallons for the last 12 months;

VOC o = volatile organic compound content of pan/cleanup materials o in pounds of VOC per gallon;

Capture = the capture efficiency, assume 0%; and

DRE = destruction removal efficiency of any control device, 0% without controls.

[Authority for term 3745-77-07(A)(1)]

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

(1) This facility shall maintain the following monthly records on all coatings and cleanup/pan solvents materials employed in this emissions unit:

- a. the name or identification number of material employed, as applied;
- b. the VOC content of each coating employed, minus water and exempt solvents, as applied;
- c. the VOC content of each cleanup/pan solvent material employed;
- d. the volume of each coating employed, in gallons;
- e. the volume of each cleanup/pan solvent employed, in gallons;
- f. the VOC emissions, in tons, as determined by the equation in section c) of these terms and conditions; and
- g. the rolling, 12-month VOC emissions, in tons.

[Authority for term 3745-77-07(A)(3)]

(2) If a credit for recovered cleanup/pan solvent material is used to demonstrate compliance and/or used in the calculation of rolling, 12 month emission calculations, the permittee shall maintain the following records for the recovered cleanup/pan solvent material, and the recovery drum or tank serving this emissions unit:

- a. the date recovered materials were first added to the recovery tank/drum and the date the materials from the recovery drum or tank were shipped off site;
- b. the total amount of material collected and shipped for recycle/recovery and/or disposal at an outside facility, in gallons, on the day it is shipped;
- c. record of the VOC content of each cleanup/pan solvent material that is collected for recovery, in pounds per gallon, or a record of the testing results of the VOC content of the material shipped;



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- d. the mass (lbs) of VOC to be credited to the rolling, 12 month emissions summation, from each shipment of recovered material, calculated using the lowest VOC content of any cleanup/pan solvent material recovered, unless a higher VOC content is established from the testing results of the recovered material shipped (i.e., $b \times c$), and the date of each such shipment or record of credit; and
- e. the record of the total amount of VOC emissions (lbs or tons) that may be applied as a credit, for the materials shipped for recycle/recovery and/or disposal at an outside facility, summed from the records of the VOC emission credits (d), for each shipment recorded during the rolling 12 month period.

[Authority for term 3745-77-07(A)(3)]

- (3) For each day during which the permittee burns fuel other than natural gas or propane in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.

[Authority for term 3745-77-07(A)(3)]

- (4) This facility shall, on an ongoing basis, evaluate the availability of an alternate coating and coating method that will reduce the emissions from this source and meet the coating specifications of the desired product. Should an alternate coating and/or coating method become available, as based on the Best Available Technology (BAT) for this type of operation, this facility shall submit a schedule for implementation of the alternate coatings and/or coating method within 30 days of the availability.

This facility shall submit quarterly reports that summarize the evaluation of an alternate coating and coating method which details the following information for each coating and/or coating method evaluated:

- a. The VOC content, in pounds per gallon;
- b. The acceptability;
- c. the reason why the alternative coating does not meet specification, for unacceptable coatings;
- d. The expected reduction in VOC emissions from the utilization of the acceptable alternate coatings; and
- e. The cost of modifying the source to utilize the alternate coatings and/or coating method.

These reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and shall cover the previous calendar quarter (October through December, January through March, April through June, and July through September, respectively).



Once the facility employs coatings in compliance with the requirements of OAC rule 3745-21-09(U)(1) in this source, the evaluation process of alternate coatings and the reporting requirement of this term will be discontinued.

[Authority for term 3745-77-07(A)(3)]

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

[ORC 3704.03(F)(3)(c) and F(4)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the maximum allowable cleanup/pan solvent VOC content of 7.76 pounds per gallon, minus water and exempt solvents, as applied;
 - b. all exceedances of the rolling, 12-month VOC emission limitation of 18.874 tons;
 - c. the permittee shall notify the Director (the Ohio EPA, Southwest District Office) of any record showing the use of a fuel other than natural gas or propane in this emissions unit.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-15-03(B)(1)(a)] and [OAC rule 3745-15-03(C)] and [OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall notify the Director (the Ohio EPA, Southwest District Office) in writing of any monthly record showing the use of non-complying coatings and/or cleanup/pan solvent material. These notifications shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Southwest District Office) within 30 days following the end of the calendar month.

[OAC rule 3745-77-07(C)(1)]

- (3) This facility shall submit quarterly reports that summarize the evaluation of an alternate coating and coating method which details the following information for each coating and/or coating method evaluated:
 - a. the VOC content, in pounds per gallon;



- b. the acceptability;
- c. the reason why the alternative coating does not meet specification, for unacceptable coatings;
- d. the expected reduction in VOC emissions from the utilization of the acceptable alternate coatings; and
- e. the cost of modifying the source to utilize the alternate coatings and/or coating method.

These reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and shall cover the previous calendar quarter (October through December, January through March, April through June, and July through September, respectively).

[OAC rule 3745-77-07(C)(1)]

f) **Testing Requirements**

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. **Emission Limitation:**

VOC content of cleanup/pan solvent shall not exceed 7.76 lbs VOC/gallon.

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be determined through the record keeping requirements as established in Section d) of this permit.

- b. **Emission Limitation:**

VOC content of coatings shall not exceed 5.36 lbs VOC/gallon, minus water and exempt solvents, as applied.

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be determined through the record keeping requirements as established in Section d) of this permit.

- c. **Emission Limitation:**

Volatile Organic Compound (VOC) emissions from coatings and cleanup/pan solvents materials employed shall not exceed 18.895 tons VOC per rolling 12 month period.



Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be determined through the record keeping requirements as established in Section d) of this permit.

d. Emission Limitation:

The emissions from natural gas and propane combustion in the drying ovens shall not exceed the following:

0.62 lb/hr and 2.7 tons/yr NO_x;

0.33 lb/hr and 1.45 tons/yr CO;

0.03 lb/hr and 0.13 ton/yr PE;

0.07 lb/hr and 0.30 ton/yr SO₂; and

0.02 lb/hr and 0.1 ton/yr VOC.

Applicable Compliance Method:

Compliance with the limits for natural gas combustion within the drying ovens shall be based upon the emission factors from AP-42 "Compilation of Air Pollutant Emission Factors", Tables 1.4-1 and 1.4-2 (7/98). These emission factors (lb pollutant/mmscf) multiplied by the maximum hourly gas burning capacity of the burners (one at 0.78125 mmBtu/hr, two at 1 mmBtu/hr, and four at 0.3125 mmBtu/hr) and times 1 scf/1020 Btu shall be the demonstration of compliance with the hourly limits. Compliance with the ton per year limits are documented by multiplying the calculated hourly limits by 8760 hours in a year and dividing by 2000 pounds.

Compliance with the limits for propane combustion within the drying ovens shall be based upon the emission factors from AP-42 "Compilation of Air Pollutant Emission Factors", Tables 1.5-1 (10/96). These emission factors (lb pollutant/1000 gallons) multiplied by the maximum hourly gas burning capacity of the burners (one at 0.78125 mmBtu/hr, two at 1 mmBtu/hr, and four at 0.3125 mmBtu/hr) and divided by the 91.5 MMBtu/1000 gallons shall be the demonstration of compliance with the hourly limits. Compliance with the ton per year limits are documented by multiplying the calculated hourly limits by 8760 hours in a year and dividing by 2000 pounds.

e. Emission Limitation:

Visible PE from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.



Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

f. Emission Limitation: Emission Limitation:

0.02 lbs PE per mmBtu for drying oven

Applicable Compliance Method:

Compliance with this limit shall be based upon the requirement for burning only natural gas or propane for this emissions unit.

If required, the permittee shall demonstrate compliance with this emissions limitation through a compliance demonstration performed in accordance with 40 CFR Part 60, Appendix A, Method 1 thru 5.

[Authority for term 3745-77-07(C)]

- (2) Formulation data of or USEPA Method 24 shall be used to determine the VOC content of each coating and cleanup/restoration solvent material.

[Authority for term 3745-77-07(C)]

g) Miscellaneous Requirements

- (1) None.



7. K045, Roll Coater; Department 347

Operations, Property and/or Equipment Description:

Roller Coater w/Electric Oven D.347 - modification

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) b)(1)g., and d)(5).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 05-07329)	VOC content of cleanup/pan solvent shall not exceed 7.76 pounds per gallon. The emissions from natural gas and propane combustion in the drying ovens shall not exceed the following: 0.57 lb/hr and 2.51 tons/yrNO _x ; 0.31 lb/hr and 1.35 tons/yr CO; 0.03 lb/hr and 0.12 ton/yr filterable PM; 0.06 lb/hr and 0.28 ton/yr SO ₂ ; and 0.02 lb/hr and 0.09 ton/yr VOC.
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid the requirements of 40 CFR Part 63, Subpart M)	See section B.2, 3, and 4, above.
c.	OAC rule 3745-31-05(F)	The VOC emissions from coatings, pan, and cleanup materials shall not exceed 22.8 tons per rolling 12 month period.
d.	OAC rule 3745-21-09 (U)(2)(f)(ii)	VOC content of coatings shall not exceed 5.36 lbs VOC/gallon, minus water and exempt solvents, as applied.
e.	OAC rule 3745-17-10(B)	0.02 lbs of PE per mmBtu for drying oven.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	OAC rule 3745-17-07(A) (for the drying ovens)	The Visible PE from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
g.	OAC rule 3745-114-01	Ohio Toxic Rule See Section d)(5), below.

(2) Additional Terms and Conditions

a. Pursuant to OAC rule 3745-21-09(U)(2)(f)(ii), the best available technology has been determined to be extreme performance coatings that have a VOC content greater than the limitations of OAC rules 3745-21-09(U)(1)(c).

b. The emission limitations for PM10, SO2, NOx, CO and VOC from the combustion of natural gas and/or propane in the drying ovens are established to reflect potentials to emit for this emissions unit. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary to ensure compliance with these limitations.

[Authority for term 3745-77-07(A)(3)]

c. Extreme performance coatings are exempt by BAT determination in this permit and exemption under OAC rule 3745-21-09(U)(2)(f) in this permit from the requirements for extreme performance coatings in OAC rule 3745-21-09(U)(1). If at any time a non-extreme coating is used in this emissions unit, that coating must comply with the requirements of OAC rule 3745-21-09(U)(1).

For the purpose of discontinuing the coating evaluation under section d) of this permit, the VOC content of extreme performance coating used in this emissions unit shall not exceed 3.5 lbs of VOC per gallon, as applied, minus water and exempt solvents.

[Authority for term 3745-77-07(A)(3)]

c) Operational Restrictions

(1) The permittee shall burn only natural gas and/or propane as fuel in this emissions unit.

[Authority for term 3745-77-07(A)(1)]

(2) The weight of volatile organic materials applied/used for K045 shall not exceed 22.8 tons per rolling 12 months, calculated using the following formula:

$$22.8 \text{ tons VOC} \geq \sum_{n=1}^i \frac{(P_i) \times (VOC_i) \times [1 - (\text{capture} \times DRE)]}{2000 \text{ lbs/ton}} - \frac{(P_o) \times (VOC_o)}{2000 \text{ lbs/ton}}$$



Where:

P_i = usage of coating, or pan/cleanup solvent i in gallons for the last 12 months;

VOC i = volatile organic compound content of coating i , or pan/cleanup solvent i in pounds VOC per gallon;

P_o = recovered pan/cleanup solvent o in gallons for the last 12 months;

VOC o = volatile organic compound content of pan/cleanup materials o in pounds of VOC per gallon;

Capture = the capture efficiency, assume 0%; and

DRE = destruction removal efficiency of any control device, 0% without controls.

[Authority for term 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) This facility shall maintain the following monthly records on all coatings and cleanup/pan solvents materials employed in this emissions unit:

- a. the name or identification number of material employed, as applied;
- b. the VOC content of each coating employed, minus water and exempt solvents, as applied;
- c. the VOC content of each cleanup/pan solvent material employed;
- d. the volume of each coating employed, in gallons;
- e. the volume of each cleanup/pan solvent employed, in gallons;
- f. the VOC emissions, in tons, as determined by the equation in Section c)(2) of these terms and conditions; and
- g. the rolling, 12-month VOC emissions, in tons.

[Authority for term 3745-77-07(A)(3)]

(2) If a credit for recovered cleanup/pan solvent material is used to demonstrate compliance and/or used in the calculation of rolling, 12 month emission calculations, the permittee shall maintain the following records for the recovered cleanup/pan solvent material, and the recovery drum or tank serving this emissions unit:

- a. the date recovered materials were first added to the recovery tank/drum and the date the materials from the recovery drum or tank were shipped off site;
- b. the total amount of material collected and shipped for recycle/recovery and/or disposal at an outside facility, in gallons, on the day it is shipped;



- c. record of the VOC content of each cleanup/pan solvent material that is collected for recovery, in pounds per gallon, or a record of the testing results of the VOC content of the material shipped;
- d. the mass (lbs) of VOC to be credited to the rolling, 12 month emissions summation, from each shipment of recovered material, calculated using the lowest VOC content of any cleanup/pan solvent material recovered, unless a higher VOC content is established from the testing results of the recovered material shipped (i.e., b x c), and the date of each such shipment or record of credit; and
- e. the record of the total amount of VOC emissions (lbs or tons) that may be applied as a credit, for the materials shipped for recycle/recovery and/or disposal at an outside facility, summed from the records of the VOC emission credits (d), for each shipment recorded during the rolling 12 month period.

[Authority for term 3745-77-07(A)(3)]

- (3) For each day during which the permittee burns fuel other than natural gas or propane in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.

[Authority for term 3745-77-07(A)(3)]

- (4) This facility shall, on an ongoing basis, evaluate the availability of an alternate coating and coating method that will reduce the emissions from this source and meet the coating specifications of the desired product. Should an alternate coating and/or coating method become available, as based on the Best Available Technology (BAT) for this type of operation, this facility shall submit a schedule for implementation of the alternate coatings and/or coating method within 30 days of the availability.

This facility shall submit quarterly reports that summarize the evaluation of an alternate coating and coating method which details the following information for each coating and/or coating method evaluated:

- a. The VOC content, in pounds per gallon;
- b. The acceptability;
- c. the reason why the alternative coating does not meet specification, for unacceptable coatings;
- d. The expected reduction in VOC emissions from the utilization of the acceptable alternate coatings; and
- e. The cost of modifying the source to utilize the alternate coatings and/or coating method.

These reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and shall cover the previous calendar quarter (October through December, January through March, April through June, and July through September, respectively).



Once the facility employs coatings in compliance with the requirements of OAC rule 3745-21-09(U)(1) in this source, the evaluation process of alternate coatings and the reporting requirement of this term will be discontinued.

[Authority for term 3745-77-07(A)(3)]

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

[ORC 3704.03(F)(3)(c) and F(4)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the maximum allowable cleanup/pan solvent VOC content of 7.76 pounds per gallon;
 - b. all exceedances of the rolling, 12-month VOC emission limitation of 22.8 tons;
 - c. the permittee shall notify the Director (the Ohio EPA, Southwest District Office) of any record showing the use of a fuel other than natural gas or propane in this emissions unit.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-15-03(B)(1)(a)] and [OAC rule 3745-15-03(C)] and [OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall notify the Director (the Ohio EPA, Southwest District Office) in writing of any monthly record showing the use of non-complying coatings and/or cleanup/pan solvent material. These notifications shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Southwest District Office) within 30 days following the end of the calendar month.

[OAC rule 3745-77-07(C)(1)]

- (3) This facility shall submit quarterly reports that summarize the evaluation of an alternate coating and coating method which details the following information for each coating and/or coating method evaluated:
 - a. the VOC content, in pounds per gallon;



- b. the acceptability;
- c. the reason why the alternative coating does not meet specification, for unacceptable coatings;
- d. the expected reduction in VOC emissions from the utilization of the acceptable alternate coatings; and
- e. the cost of modifying the source to utilize the alternate coatings and/or coating method.

These reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and shall cover the previous calendar quarter (October through December, January through March, April through June, and July through September, respectively).

[OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

VOC content of cleanup/pan solvent shall not exceed 7.76 lbs VOC/gallon.

Applicable Compliance Method:

Compliance shall be determined based on the record keeping requirements established in section d) of this permit.

- b. Emission Limitation:

VOC content of coatings shall not exceed 5.36 lbs VOC/gallon, minus water and exempt solvents, as applied.

Applicable Compliance Method:

Compliance shall be determined based on the record keeping requirements established in section d) of this permit.

- c. Emission Limitation:

Volatile Organic Compound (VOC) emissions from coatings and cleanup/pan solvents materials employed shall not exceed 22.8 tons VOC per rolling 12 month period.



Applicable Compliance Method:

Compliance shall be determined based on the record keeping requirements established in section d) of this permit.

d. Emission Limitation:

The emissions from natural gas and propane combustion in the drying ovens shall not exceed the following:

0.57 lb/hr and 2.51 tons/yrNO_x;

0.31 lb/hr and 1.35 tons/yr CO;

0.03 lb/hr and 0.12 ton/yr PE;

0.06 lb/hr and 0.28 ton/yr SO₂; and

0.02 lb/hr and 0.09 ton/yr VOC.

Applicable Compliance Method:

Compliance with the limits for natural gas combustion within the drying ovens shall be based upon the emission factors from AP-42 "Compilation of Air Pollutant Emission Factors", Tables 1.4-1 and 1.4-2 (7/98). These emission factors (lb pollutant/mmscf) multiplied by the maximum hourly gas burning capacity of the burners (one at 1.75 mmBtu/hr, one at 1 mmBtu/hr, and six at 0.3125 mmBtu/hr) and times 1 scf/1020 Btu shall be the demonstration of compliance with the hourly limits. Compliance with the ton per year limits are documented by multiplying the calculated hourly limits by 8760 hours in a year and dividing by 2000 pounds.

Compliance with the limits for propane combustion within the drying ovens shall be based upon the emission factors from AP-42 "Compilation of Air Pollutant Emission Factors", Tables 1.5-1 (10/96). These emission factors (lb pollutant/1000 gallons) multiplied by the maximum hourly gas burning capacity of the burners (one at 1.75 mmBtu/hr, one at 1 mmBtu/hr, and six at 0.3125 mmBtu/hr) and divided by the 91.5 MMBtu/1000 gallons shall be the demonstration of compliance with the hourly limits. Compliance with the ton per year limits are documented by multiplying the calculated hourly limits by 8760 hours in a year and dividing by 2000 pounds.

e. Emission Limitation:

Visible PE from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.



Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

f. Emission Limitation: Emission Limitation:

0.02 lbs PE per mmBtu for drying oven

Applicable Compliance Method:

Compliance with this limit shall be based upon the requirement for burning only natural gas or propane for this emissions unit.

If required, the permittee shall demonstrate compliance with this emissions limitation through a compliance demonstration performed in accordance with 40 CFR Part 60, Appendix A, Method 1 thru 5.

[Authority for term 3745-77-07(C)]

- (2) Formulation data of or USEPA Method 24 shall be used to determine the VOC content of each coating and cleanup/pan solvent material.

[Authority for term 3745-77-07(C)]

g) Miscellaneous Requirements

- (1) None.



8. K046, E-coat Line

Operations, Property and/or Equipment Description:

E-Coat, w/ natural gas-fired oven

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) b)(1)g., and d)(3).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 05-14394)	The Volatile Organic Compounds (VOC) content of replenishment material used in this emissions unit shall not exceed 0.19lb/gallon, as applied. The VOC content of cleanup materials employed on this emission unit shall not exceed 0.68 lb VOC/lb cleanup material The emissions from natural gas combustion in the drying ovens shall not exceed the following: 0.429 lb/hr and 1.88 tons/yrNO _x ; 0.36 lb/hr and 1.58 tons/yr CO; 0.033 lb/hr and 0.14 ton/yr filterable PM; 0.003 lb/hr and 0.01 ton/yr SO ₂ ; and 0.024 lb/hr and 0.1 ton/yr VOC. See Sections b)(2)a., b)(2)b., c)(1), d)(1), d)(2), e)(1), f)(1)a., and f)(1)b., below.
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid the requirements of 40 CFR Part 63, Subpart Mmmm)	See section B.2, 3, and 4, above.
c.	OAC rule 3745-31-05(F)	The maximum replenishment material usage for this emissions unit shall not exceed 100,000 gallons per rolling 12-month period.



Preliminary Proposed Title V Permit

American Trim L.L.C.

Permit Number: P0115643

Facility ID: 0575010106

Effective Date: To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>The maximum cleanup material usage for this emissions unit shall not exceed 150 gallons per rolling 12-month period.</p> <p>Emissions of VOC excluding oven emissions shall not exceed 9.93 tons per rolling 12-month period.</p> <p>See Section d)(1), e)(1, and f)(1)c., below</p>
d.	OAC rule 3745-21-09(U)	See Section b)(2)b., below.
e.	OAC rule 3745-17-07(A) (for the drying ovens)	<p>The Visible PE from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.</p> <p>See Section f)(1)e, below.</p>
f.	OAC rule 3745-17-11(B) (for the drying ovens)	<p>0.02 lbs PE per mmBtu for drying oven</p> <p>See Sections b)(2)a, c)(1), d)(2), e)(1), and f)(1)f, below.</p>
g.	OAC rule 3745-114-01	<p>Ohio Toxic Rule</p> <p>See Section d)(3), below.</p>

(2) Additional Terms and Conditions

- a. The emission limitations for PM10, SO2, NOx, CO and VOC from the combustion of natural gas and in the drying ovens are established to reflect potentials to emit for this emissions unit. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary to ensure compliance with these limitations.

[Authority for term 3745-77-07(A)(3)]

- b. This limitation for the coating, calculates to 0.64 lb VOC per gallon of coating minus water and exempt solvents, and is more stringent than the limits found in OAC rule 3745-21-09(U).

c) Operational Restrictions

- (1) The permittee shall burn only natural gas in this emissions unit.

[Authority for term 3745-77-07(A)(1)]



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

- (1) The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification number of each coating, and cleanup material, as applied;
 - b. the VOC content of each coating, as applied;
 - c. the VOC content of each cleanup material employed;
 - d. the volume in gallons of each coating employed;
 - e. the volume in gallons of each cleanup material employed;
 - f. the monthly VOC emissions from the coatings, and cleanup materials employed, i.e., multiply the monthly volume, in gallons, of each coating and cleanup/pan solvent material employed by its respective VOC content, and summarize the results;
 - g. the rolling, 12 month usage summation for coatings, and cleanup materials employed; and
 - h. the rolling, 12 month summation of VOC emissions from the coating, and cleanup material employed, prior to any credit for recovered materials.

[Authority for term 3745-77-07(A)(3)]

- (2) For each day during which the permittee burns fuel other than natural gas in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.

[Authority for term 3745-77-07(A)(3)]

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

[ORC 3704.03(F)(3)(c) and F(4)]

e) **Reporting Requirements**

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:



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Facility ID: 0575010106

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- a. all exceedances of the maximum allowable cleanup solvent VOC content of 0.68 pounds per gallon, as applied;
- b. all exceedances of allowable replenishment material usage of 100,000 gallons per rolling 12-month period;
- c. all exceedances of allowable cleanup material usage of 150 gallons per rolling 12-month period;
- d. all exceedances of the rolling, 12-month VOC emission limitation of 9.93 tons;
- e. the permittee shall notify the Director (the Ohio EPA, Southwest District Office) of any record showing the use of a fuel other than natural gas in this emissions unit.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-15-03(B)(1)(a)] and [OAC rule 3745-15-03(C)] and [OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall notify the Director (the Ohio EPA, Southwest District Office) in writing of any monthly record showing the use of non-complying coatings. These notifications shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Southwest District Office) within 30 days following the end of the calendar month.

[OAC rule 3745-77-07(C)(1)]

f) **Testing Requirements**

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. **Emission Limitations:**

The VOC content of replenishment material used in this emissions unit shall not exceed 0.19 lb/gallon.

The VOC content of cleanup materials employed on this emission unit shall not exceed 0.68 lb VOC/lb of cleanup material

Applicable Compliance Method:

Formulation data or USEPA Method 24 shall be used to determine the VOC content of the coatings and cleanup materials. The record keeping requirements contained in Section d)(1) shall demonstrate that only materials with these VOC content limitations are applied.

- b. The emissions from natural gas combustion in the drying ovens shall not exceed the following:



0.429 lb/hr and 1.88 tons/yrNOx;

0.36 lb/hr and 1.58 tons/yr CO;

0.033 lb/hr and 0.14 ton/yr filterable PM;

0.003 lb/hr and 0.01 ton/yr SO2; and

0.024 lb/hr and 0.1 ton/yr VOC.

Applicable Compliance Method:

Compliance with the limits for natural gas combustion within the drying ovens shall be based upon the emission factors from AP-42 "Compilation of Air Pollutant Emission Factors", Tables 1.4-1 and 1.4-2 (7/98). These emission factors (lb pollutant/10 mmscf) multiplied by the maximum hourly gas burning capacity of the burners (4.375 mmBtu) and times 1 scf/1020 00 Btu shall be the demonstration of compliance with the hourly limits. Compliance with the ton per year limits are documented by multiplying the calculated hourly limits by 8760 hours in a year and dividing by 2000 pounds.

c. Emission Limitation:

Emissions of VOC excluding oven emissions shall not exceed 9.93 tons per rolling 12-month period.

The above emissions limitation was established based on the following equation:

$$AER = \sum \frac{[(Pi) \times (VOCi)] \times [1 - (Capture \times DRE)]}{2000}$$

Where:

AER = Annual emission rate, in tons;

P = usage of each coating or cleanup material in gallons;

VOC = volatile organic compound content of each coating or cleanup material in pounds VOC per gallon;

capture = the capture efficiency, assumed to be 0%; and

DRE = destruction removal efficiency of any control device, 0% without controls.

Applicable Compliance Method:

Compliance shall be assumed so long as the permittee does not exceed the VOC content limitations for both coatings (0.19 lb/gallon) and cleanup materials (0.68 lb/lb of cleanup material), nor the usage limitations for coatings (100,000 gallons) and cleanup materials (150 gallons). Compliance may also be demonstrated through the following calculation:



d. Emission Limitation:

Visible PE from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

e. Emission Limitation: Emission Limitation:

0.02 lbs PE per mmBtu for drying oven

Applicable Compliance Method:

Compliance with this limit shall be based upon the requirement for burning only natural gas or propane for this emissions unit.

If required, the permittee shall demonstrate compliance with this emissions limitation through a compliance demonstration performed in accordance with 40 CFR Part 60, Appendix A, Method 1 thru 5.

[Authority for term 3745-77-07(C)]

- (2) Formulation data of or USEPA Method 24 shall be used to determine the VOC content of each coating and cleanup/pan solvent material.

[Authority for term 3745-77-07(C)]

g) Miscellaneous Requirements

- (1) None.



9. K048, Dept 174

Operations, Property and/or Equipment Description:

Department 174 printing/coating line

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) b)(1)g., and d)(5).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 05-13963)	VOC content of cleanup/pan solvent shall not exceed 7.76 pounds per gallon. The emissions from natural gas and propane combustion in the drying ovens shall not exceed the following: 2.12 lb/hr and 9.28 tons/yrNO _x ; 1.14 lb/hr and 5.0 tons/yr CO; 0.11 lb/hr and 0.46 ton/yr filterable PM; 0.24 lb/hr and 01.02 ton/yr SO ₂ ; and 0.08 lb/hr and 0.34 ton/yr VOC.
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid the requirements of 40 CFR Part 63, Subpart Mmmm)	See section B.2, 3, and 4, above.
c.	OAC rule 3745-31-05(F)	The VOC emissions from coatings, pan, and cleanup materials shall not exceed 27.8 tons per rolling 12 month period.
d.	OAC rule 3745-21-09 (U)(2)(f)(ii)	VOC content of coatings shall not exceed 5.21 lbs VOC/gallon, minus water and exempt solvents, as applied.
e.	OAC rule 3745-17-10(B)	0.02 lbs of PE per mmBtu for drying oven.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	OAC rule 3745-17-07(A) (for the drying ovens)	The Visible PE from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
g.	OAC rule 3745-114-01	Ohio Toxic Rule See Section d)(5), below.

(2) Additional Terms and Conditions

a. Pursuant to OAC rule 3745-21-09(U)(2)(f)(ii), the best available technology has been determined to be extreme performance coatings that have a VOC content greater than the limitations of OAC rules 3745-21-09(U)(1)(c).

b. The emission limitations for PM10, SO2, NOx, CO and VOC from the combustion of natural gas and/or propane in the drying ovens are established to reflect potentials to emit for this emissions unit. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary to ensure compliance with these limitations.

[Authority for term 3745-77-07(A)(3)]

c. Extreme performance coatings are exempt by BAT determination in this permit and exemption under OAC rule 3745-21-09(U)(2)(f) in this permit from the requirements for extreme performance coatings in OAC rule 3745-21-09(U)(1). If at any time a non-extreme coating is used in this emissions unit, that coating must comply with the requirements of OAC rule 3745-21-09(U)(1).

For the purpose of discontinuing the coating evaluation under section d)(4) of this permit, the VOC content of extreme performance coating used in this emissions unit shall not exceed 3.5 lbs of VOC per gallon, as applied, minus water and exempt solvents.

[Authority for term 3745-77-07(A)(3)]

c) Operational Restrictions

(1) The permittee shall burn only natural gas and/or propane as fuel in this emissions unit.

[Authority for term 3745-77-07(A)(1)]

(2) The weight of volatile organic materials applied/used for K045 shall not exceed 27.8 tons per rolling 12 months, calculated using the following formula:

$$27.8 \text{ tons VOC} \geq \sum_{n=1}^i \frac{(Pi)x(VOCi)x [1-(capturexDRE)]}{2000 \text{ lbs/ton}} - \frac{(Po)x (VOCo)}{2000 \text{ lbs/ton}}$$



Where:

P_i = usage of coating, or pan/cleanup solvent i in gallons for the last 12 months;

VOC i = volatile organic compound content of coating i , or pan/cleanup solvent i in pounds VOC per gallon;

P_o = recovered pan/cleanup solvent o in gallons for the last 12 months;

VOC o = volatile organic compound content of pan/cleanup materials o in pounds of VOC per gallon;

Capture = the capture efficiency, assume 0%; and

DRE = destruction removal efficiency of any control device, 0% without controls.

[Authority for term 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) This facility shall maintain the following monthly records on all coatings and cleanup/pan solvents materials employed in this emissions unit:

- a. the name or identification number of material employed, as applied;
- b. the VOC content of each coating employed, minus water and exempt solvents, as applied;
- c. the VOC content of each cleanup/pan solvent material employed;
- d. the volume of each coating employed, in gallons;
- e. the volume of each cleanup/pan solvent employed, in gallons;
- f. the VOC emissions, in tons, as determined by the equation in Section c)(2) of these terms and conditions; and
- g. the rolling, 12-month VOC emissions, in tons.

[Authority for term 3745-77-07(A)(3)]

(2) If a credit for recovered cleanup/pan solvent material is used to demonstrate compliance and/or used in the calculation of rolling, 12 month emission calculations, the permittee shall maintain the following records for the recovered cleanup/pan solvent material, and the recovery drum or tank serving this emissions unit:

- a. the date recovered materials were first added to the recovery tank/drum and the date the materials from the recovery drum or tank were shipped off site;
- b. the total amount of material collected and shipped for recycle/recovery and/or disposal at an outside facility, in gallons, on the day it is shipped;



- c. record of the VOC content of each cleanup/pan solvent material that is collected for recovery, in pounds per gallon, or a record of the testing results of the VOC content of the material shipped;
- d. the mass (lbs) of VOC to be credited to the rolling, 12 month emissions summation, from each shipment of recovered material, calculated using the lowest VOC content of any cleanup/pan solvent material recovered, unless a higher VOC content is established from the testing results of the recovered material shipped (i.e., $b \times c$), and the date of each such shipment or record of credit; and
- e. the record of the total amount of VOC emissions (lbs or tons) that may be applied as a credit, for the materials shipped for recycle/recovery and/or disposal at an outside facility, summed from the records of the VOC emission credits (d), for each shipment recorded during the rolling 12 month period.

[Authority for term 3745-77-07(A)(3)]

- (3) For each day during which the permittee burns fuel other than natural gas or propane in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.

[Authority for term 3745-77-07(A)(3)]

- (4) This facility shall, on an ongoing basis, evaluate the availability of an alternate coating and coating method that will reduce the emissions from this source and meet the coating specifications of the desired product. Should an alternate coating and/or coating method become available, as based on the Best Available Technology (BAT) for this type of operation, this facility shall submit a schedule for implementation of the alternate coatings and/or coating method within 30 days of the availability.

This facility shall submit quarterly reports that summarize the evaluation of an alternate coating and coating method which details the following information for each coating and/or coating method evaluated:

- a. The VOC content, in pounds per gallon;
- b. The acceptability;
- c. the reason why the alternative coating does not meet specification, for unacceptable coatings;
- d. The expected reduction in VOC emissions from the utilization of the acceptable alternate coatings; and
- e. The cost of modifying the source to utilize the alternate coatings and/or coating method.

These reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and shall cover the previous calendar quarter (October through December, January through March, April through June, and July through September, respectively).



Once the facility employs coatings in compliance with the requirements of OAC rule 3745-21-09(U)(1) in this source, the evaluation process of alternate coatings and the reporting requirement of this term will be discontinued.

[Authority for term 3745-77-07(A)(3)]

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

[ORC 3704.03(F)(3)(c) and F(4)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the maximum allowable cleanup/pan solvent VOC content of 7.76 pounds per gallon;
 - b. all exceedances of the rolling, 12-month VOC emission limitation of 27.8 tons;
 - c. the permittee shall notify the Director (the Ohio EPA, Southwest District Office) of any record showing the use of a fuel other than natural gas or propane in this emissions unit.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-15-03(B)(1)(a)] and [OAC rule 3745-15-03(C)] and [OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall notify the Director (the Ohio EPA, Southwest District Office) in writing of any monthly record showing the use of non-complying coatings and/or cleanup/pan solvent material. These notifications shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Southwest District Office) within 30 days following the end of the calendar month.

[OAC rule 3745-77-07(C)(1)]

- (3) This facility shall submit quarterly reports that summarize the evaluation of an alternate coating and coating method which details the following information for each coating and/or coating method evaluated:
 - a. the VOC content, in pounds per gallon;



- b. the acceptability;
- c. the reason why the alternative coating does not meet specification, for unacceptable coatings;
- d. the expected reduction in VOC emissions from the utilization of the acceptable alternate coatings; and
- e. the cost of modifying the source to utilize the alternate coatings and/or coating method.

These reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and shall cover the previous calendar quarter (October through December, January through March, April through June, and July through September, respectively).

[OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

VOC content of cleanup/pan solvent shall not exceed 7.76 lbs VOC/gallon.

Applicable Compliance Method:

Formulation data or USEPA Method 24 shall be used to determine the VOC content of the cleanup/pan solvent. The record keeping requirements contained in Section d) shall demonstrate that only materials with these VOC content limitations are applied.

- b. Emission Limitation:

VOC content of coatings shall not exceed 5.21 lbs VOC/gallon, minus water and exempt solvents, as applied.

Applicable Compliance Method:

Formulation data or USEPA Method 24 shall be used to determine the VOC content of the coatings. The record keeping requirements contained in Section d) shall demonstrate that only materials with these VOC content limitations are applied.

- c. Emission Limitation:

Volatile Organic Compound (VOC) emissions from coatings and cleanup/pan solvents materials employed shall not exceed 27.8 tons VOC per rolling 12 month period.



Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be determined through the record keeping requirements as established in Section d) of this permit.

d. Emission Limitation:

The emissions from natural gas and propane combustion in the drying ovens shall not exceed the following:

2.12 lb/hr and 9.28 tons/yr NO_x;

1.14 lb/hr and 5.0 tons/yr CO;

0.11 lb/hr and 0.46 ton/yr PE;

0.24 lb/hr and 1.02 ton/yr SO₂; and

0.08 lb/hr and 0.34 ton/yr VOC.

Applicable Compliance Method:

Compliance with the limits for natural gas combustion within the drying ovens shall be based upon the emission factors from AP-42 "Compilation of Air Pollutant Emission Factors", Tables 1.4-1 and 1.4-2 (7/98). These emission factors (lb pollutant/mmscf) multiplied by the maximum hourly gas burning capacity of the burners (one at 2.5 mmBtu/hr, two at 3.75 mmBtu/hr, one at 3.4375 mmBtu/hr, and one at 0.4 mmBtu/hr) and times 1 scf/1020 Btu shall be the demonstration of compliance with the hourly limits. Compliance with the ton per year limits are documented by multiplying the calculated hourly limits by 8760 hours in a year and dividing by 2000 pounds.

Compliance with the limits for propane combustion within the drying ovens shall be based upon the emission factors from AP-42 "Compilation of Air Pollutant Emission Factors", Tables 1.5-1 (10/96). These emission factors (lb pollutant/1000 gallons) multiplied by the maximum hourly gas burning capacity of the burners (one at 2.5 mmBtu/hr, two at 3.75 mmBtu/hr, one at 3.4375 mmBtu/hr, and one at 0.4 mmBtu/hr) and divided by the 91.5 MMBtu/1000 gallons shall be the demonstration of compliance with the hourly limits. Compliance with the ton per year limits are documented by multiplying the calculated hourly limits by 8760 hours in a year and dividing by 2000 pounds.

e. Emission Limitation:

Visible PE from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.



Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

f. Emission Limitation: Emission Limitation:

0.02 lbs PE per mmBtu for drying oven

Applicable Compliance Method:

Compliance with this limit shall be based upon the requirement for burning only natural gas or propane for this emissions unit.

If required, the permittee shall demonstrate compliance with this emissions limitation through a compliance demonstration performed in accordance with 40 CFR Part 60, Appendix A, Method 1 thru 5.

[Authority for term 3745-77-07(C)]

- (2) Formulation data of or USEPA Method 24 shall be used to determine the VOC content of each coating and cleanup/pan solvent material.

[Authority for term 3745-77-07(C)]

g) Miscellaneous Requirements

- (1) None.



10. Emissions Unit Group Coating/Printing Press: K005, K007

EU ID Operations, Property and/or Equipment Description

K005 Coating/Printing Press C-5

K007 Coating/Printing Press C-3

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) b)(1)g., and d)(3).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	3745-31-05(A)(3) PTI 05-14397	The Volatile organic compound (VOC) content of the coatings shall not exceed 5.35 pounds per gallon. The emissions from natural gas and propane combustion in the drying ovens shall not exceed the following: 0.6 lb/hr and 2.714 tons/yr nitrogen oxides (NOx) 0.252 lb/hr and 1.104 ton/yr carbon monoxide (CO) 0.02 lb/hr and 0.086 ton/yr filterable particulate emissions (PE) 0.023 lb/hr and 0.1 ton/yr PM10 0.002 lb/hr and 0.008 ton/yr sulfur dioxide (SO2) 0.017 lb/hr and 0.072 ton/yr VOC
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid the requirements of 40 CFR Part 63, Subpart Mmmm)	See section B.2, 3, and 4, above.
c.	OAC rule 3745-31-05(F)	The VOC emissions, for emissions units K005 through K009, combined, shall not exceed 14.87 tons per rolling, 12-month period.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-21-09(U)(2)(e)(iii)	The coatings usage in this emissions unit shall not exceed 10 gallons per day.
e.	OAC rule 3745-17-10(B)	0.02 lb PE per mmBtu for the drying oven
f.	OAC rule 3745-17-07(A) (for the drying ovens)	The Visible PE from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
g.	OAC rule 3745-114-01	Ohio Toxic Rule See Section d)(3). below.

(2) Additional Terms and Conditions

- a. The emission limitations for PM10, SO2, NOx, CO and VOC from the combustion of natural gas and/or propane in the drying ovens are established to reflect potentials to emit for this emissions unit. Therefore, no additional monitoring, record keeping and/or reporting requirements are necessary to ensure compliance with these limitations.

[Authority for term 3745-77-07(A)(3)]

c) Operational Restrictions

- (1) The permittee shall burn only natural gas and/or propane as fuel in this emissions unit.

[Authority for term 3745-77-07(A)(1)]

- (2) The combined emissions of VOC from emissions units K005 through K009, inclusive, shall not exceed 14.87 tons per rolling, 12-month period, calculated according to the following formula:

$$14.87 \geq \sum_{n=1}^i \left(\frac{(Pi) \times (VOCi)}{2000} \right) - \left(\frac{(Rp) \times (Po) \times (VOCo)}{2000} \right)$$

Where:

Pi = usage of each coating, cleanup, or restoration material in gallons;

VOCi = volatile Organic compound content of each coating, cleanup, or restoration material in pounds VOC per gallon;

Rp = ratio of solvent used on emissions units K005 through K009 (total solvent used on all emissions units - the amount of solvent used on emissions unit K045);



Po =total gallons of recovered solvents less the gallons of solvent recovered from emissions unit K045, for the subject time period; and

VOC_o = VOC content of recovered solvents in pounds of VOC per gallon.

[Authority for term 3745-77-07(A)(1)]

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

(1) The permittee shall collect and record the following information each day this emissions unit is in operation:

- a. the name and identification number of each coating employed;
- b. the volume, in gallons, of each coating employed;
- c. the total volume, in gallons, of all the coatings employed; and
- d. the VOC content of each coating employed, in lbs/gallon of coating.

[Authority for term 3745-77-07(A)(3)]

(2) The permittee shall collect and record the following information each month for emissions units K005 through K009, inclusive, combined:

- a. the name or identification number for each coating and cleanup/restoration solvent employed;
- b. the VOC content of each coating and cleanup/restoration solvent material employed, in pounds per gallon, as applied;
- c. the volume, in gallons, of each coating and cleanup/restoration solvent material employed;
- d. the VOC emissions, in tons, as determined by the equation in Section c)(2), of these terms and conditions; and
- e. the rolling, 12-month VOC emissions, in tons.

[Authority for term 3745-77-07(A)(3)]

(3) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the



composition of the materials or use of new materials that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

[ORC 3704.03(F)(3)(c) and F(4)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the maximum allowable coatings VOC content of 5.35 pounds per gallon, as applied; and
 - b. all exceedances of the rolling, 12-month VOC emission limitation of 14.87 tons (for emissions units K005 through K009, combined).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-15-03(B)(1)(a)] and [OAC rule 3745-15-03(C)] and [OAC rule 3745-77-07(C)(1)].

- (2) The permittee shall notify the Director any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. A copy of such record shall be sent to the director within forty-five days after the exceedance occurs.

[OAC rule 3745-21-09(B)(3)(e)]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

The VOC content of the coatings shall not exceed 5.35 pounds per gallon of coating.

Applicable Compliance Method:

Compliance with the allowable VOC content limitation above shall be demonstrated through the record keeping requirements as established in d) of this permit.
 - b. Emission Limitation:

The VOC emissions, for emissions units K005 through K009, combined, shall not exceed 14.87 tons per rolling, 12-month period.



Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be demonstrated through the record keeping requirements established in Section d) of this permit.

c. Operational Restriction:

10 gallons of coatings/day

Applicable Compliance Method:

Compliance with the operational restriction above shall be demonstrated through the record keeping requirements as established in d)(1) of this permit.

d. Emission Limitation:

Visible PE from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

e. Emission Limitations:

- i. 0.6 lb/hr and 2.714 tons/yrNOx
- ii. 0.252 lb/hr and 1.104 ton/yr CO
- iii. 0.02 lb/hr and 0.086 ton/yr PE
- iv. 0.023 lb/hr and 0.1 ton/yr PM10
- v. 0.002 lb/hr and 0.008 ton/yr SO2
- vi. 0.017 lb/hr and 0.072 ton/yr VOC
- vii. 3.41 lb/hr and 14.92 ton/yr VOC *

* Combined allowable from emissions units K005-K009.

Applicable Compliance Method:

The permittee may demonstrate compliance with the hourly allowable emission limitations above by multiplying the maximum hourly natural gas/propane consumption rate by the appropriate emission factor from USEPA's AP-42.



If required, the permittee shall demonstrate compliance with the hourly allowable emission limitations above based on the results of emission testing conducted in accordance with the following Methods:

- i. for NO_x, Methods 1 - 4 and 7 of 40 CFR Part 60, Appendix A;
- ii. for CO, Methods 1 - 4 and 10 of 40 CFR Part 60, Appendix A;
- iii. for PE, Methods 1 - 5 of 40 CFR Part 60, Appendix A;
- iv. for PM₁₀, Methods 201 and 202 of 40 CFR Part 60, Appendix A;
- v. for SO₂, Methods 1 - 4 and 10 of 40 CFR Part 60, Appendix A; and
- vi. for VOC, Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

Compliance with the annual allowable emission limitations above shall be ensured as long as compliance with the hourly allowable emission limitations is maintained (the annual allowable limitations were determined by multiplying the hourly allowable limitations by 8760, and then dividing by 2000).

- f. Emission Limitation: Emission Limitation:

0.02 lbs PE per mmBtu for drying oven

Applicable Compliance Method:

Compliance with this limit shall be based upon the requirement for burning only natural gas or propane for this emissions unit.

If required, the permittee shall demonstrate compliance with this emissions limitation through a compliance demonstration performed in accordance with 40 CFR Part 60, Appendix A, Method 1 thru 5.

[Authority for term 3745-77-07(C)]

- (2) Formulation data of or USEPA Method 24 shall be used to determine the VOC content of each coating and cleanup/restoration solvent material.

[Authority for term 3745-77-07(C)]

- g) Miscellaneous Requirements

- (1) None.



11. Emissions Unit Group -Screen Wash: P115,P116,

EU ID	Operations, Property and/or Equipment Description
P115	Screen washer - A (Terms of this permit supersede those identified for this emissions unit in PTI 05-13345 issued on 2/3/05.)
P116	Screen washer - B (Terms in this permit supersede those identified for this emissions unit in PTI 05-13345 issued on 2/3/05.)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) b)(1)d and d)(3), below.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC Rule 3745-31-05(A)(3) (PTI 05-13943)	The volatile organic compound (VOC) content of the cleaning solution shall not exceed 8.5 lbs VOC/gallon.
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid the requirements of 40 CFR Part 63, Subpart Mmmm)	See section B.2, 3, and 4, above.
c.	OAC rule 3745-31-05(F)	VOC emissions from emission units P115 and P116 combined shall not exceed 40.0 tons per rolling 12-month period.
d.	OAC rule 3745-114-01	Ohio Toxic Rule See Sections d)(3), below.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information for emissions units P115 and P116, combined:
- a. the company name or identification for each cleaning solution employed;
 - b. the volume, in gallons, of each cleaning solution employed;
 - c. the VOC content of each cleaning solution employed, in pounds per gallon;
 - d. the rolling 12-month summation of VOC emissions from the cleaning solution employed, prior to any credit claimed for solvent recycling i.e., the sum of the usage of each cleaning solution employed multiplied by its respective VOC content.

[Authority for term 3745-77-07(A)(3)]

- (2) If a credit for recovered cleaning solution is used to demonstrate compliance and/or used in the calculation of rolling, 12 month emission calculations, the permittee shall maintain the following records for the recovered cleaning solution, and the recovery drum or tank serving this emissions unit:
- a. the date recovered materials were first added to the recovery tank/drum and the date the materials from the recovery drum or tank were shipped off site;
 - b. the total amount of material collected and shipped for recycle/recovery and/or disposal at an outside facility, in gallons, on the day it is shipped;
 - c. a record of the VOC content of each cleanup/pan solvent material that is collected for recovery, in pounds per gallon, or a record of the testing results of the VOC content of the material shipped;
 - d. the mass (lbs) of VOC to be credited to the rolling, 12 month emissions summation, from each shipment of recovered material, calculated using the lowest VOC content of any cleanup/pan solvent material recovered, unless a higher VOC content is established from the testing results of the recovered material shipped (i.e., $b \times c$), and the date of each such shipment or record of credit; and
 - e. the record of the total amount of VOC emissions (lbs or tons) that may be applied as a credit, for the materials shipped for recycle/recovery and/or disposal at an outside facility, summed from the records of the VOC emission credits (d), for each shipment recorded during the rolling 12 month period.

[Authority for term 3745-77-07(A)(3)]

- (3) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and



obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials or use of new materials that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

[ORC 3704.03(F)(3)(c) and F(4)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. any monthly record showing the volatile organic compound (VOC) content of the cleaning solution exceeded 8.5 lbs VOC/gallon; and
 - b. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitation upon VOC emissions for emission units P115 and P116 combined of 40 tons.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-15-03(B)(1)(a)] and [OAC rule 3745-15-03(C)] and [OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

The volatile organic compound (VOC) content of the cleaning solution shall not exceed 8.5 lbs VOC/gallon.

Applicable Compliance Method:

Compliance shall be determined based on the record keeping requirements contained in d) of this permit.

Formulation data or USEPA Method 24 shall be used to determine the VOC content of the cleaning solutions.
 - b. Emission Limitation:

VOC emissions from emission units P115 and P116 combined shall not exceed 40.0 tons per rolling 12-month period.

The above limitation is based on the following equation:



$$40.0 \text{ tons} \geq \sum_{n=1}^i \frac{(G_i) \times (V_i)}{2000} \text{ lbs/ton} - \frac{(R_w) \times (P_o) \times (VOC_o)}{2000} \text{ lbs/ton}$$

[Sum of all (Vi)(Gi)] ÷ 2000 lbs/Ton] - [(Rw)(Po)(VOCo)÷ 2000 lbs/Ton]

where

Vi = VOC content in pounds per gallon of each cleaning solution, subject to the following limitation: Vi ≤ 8.5 lbs VOC/gallon;

Gi = Gallons used of each cleaning solution for the rolling 12 month period;

Rw = ratio of solvent used on Emission units P115 and P116 to (total solvent used on all Emission units - the amount of solvent used on Emission unit K045);

Po = total gallons of recovered solvents less the gallons of solvent recovered from Emission unit K045, for the subject time period; and

VOCo = VOC content of recovered solvents in pounds of VOC per gallon

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emissions limitation shall be determined through the record keeping requirements established in d) of this permit.

[Authority for term 3745-77-07(C)]

- (2) Formulation data of or USEPA Method 24 shall be used to determine the VOC content of each solvent containing material.

[Authority for term 3745-77-07(C)]

g) Miscellaneous Requirements

- (1) None.



**12. Emissions Unit Group -Stamping Press 6.76 lbs VOC/hr:
P081,P082,P085,P086,P087,P088,P089,P090,P091,P092,P093,P094,P095,P096,P097,P098,P099,P100,P101,P102,P103,P104,**

EU ID	Operations, Property and/or Equipment Description
P081	Stamping Press 1-269
P082	Stamping Press 1-082
P085	Stamping Press 1-213
P086	Stamping Press 1-247
P087	Stamping Press 1-087
P088	Stamping Press 1-088
P089	Stamping Press 1-248
P090	Stamping Press 1-249
P091	Stamping Press 1-091
P092	Stamping Press 1-251
P093	Stamping Press 1-252
P094	Stamping Press 1-253
P095	Stamping Press 1-272
P096	Stamping Press 1-276
P097	Stamping Press 1-278
P098	Stamping Press 1-279
P099	Stamping Press 1-280
P100	Stamping Press 1-286
P101	Stamping Press 1-291
P102	Stamping Press 1-292
P103	Stamping Press 1-293
P104	Stamping Press 1-299

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) b)(1)d., and d)(2), below.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC Rule 3745-31-05(A)(3) (PTI 05-13323)	The volatile organic compound (VOC) content of lubricating oils shall not exceed 6.76 pounds per gallon. See Sections c)(1), c)(2), d)(1), e)(1), f)(1)a., and f)(1)b., below.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid the requirements of 40 CFR Part 63, Subpart MMMM)	See section B.2, 3, and 4, above.
c.	OAC rule 3745-31-05(F)	The combined volatile organic compound (VOC) emissions shall not exceed 48.02 tons as a rolling, 12-month summation for emissions units P081 through P104, inclusive. See Sections d)(1), e)(1), and f)(1)c., below.
d.	OAC rule 3745-114-01	See Section d)(2), below.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) VOC emissions from emissions units P080 through P104 combined shall not exceed 48.02 tons per rolling 12-month period. Emissions shall be calculated according to the following formula:

$$48.02 \text{ tons} \geq \sum_{n=1}^i \frac{(G_i) \times (V_i)}{2000} \text{ lbs/ton}$$

Where

G_i = usage of lubricant i in gallons for the rolling 12-month period

V_i = VOC content of lubricant i in pounds of VOC per gallon, subject to the following limitation: $V_i \leq 6.76$ lbs VOC/gallon

i = total number of unique lubricants used on emission units P081 through P106 combined.

[Authority for term 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information for emissions units P081 through P104, combined:



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- a. the company name or identification for each lubricating oil with a VOC content greater than zero (0) employed;
- b. whether or not each liquid organic materials employed have boiling points exceeding 200 degrees Fahrenheit at 0.5 millimeter mercury absolute pressure or the materials have been exposed to temperatures exceeding 220 degrees Fahrenheit;
- c. the volume, in gallons, of each lubricating oil employed per rolling, 12-month summation;
- d. the VOC content of each lubricating oil solvent employed, in pounds per gallon;
- e. the rolling 12-month summation of VOC emissions from the lubricating oils employed, i.e., the sum of the usage of each lubricating oil employed multiplied by its respective VOC content.

[Authority for term 3745-77-07(A)(3)]

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

[ORC 3704.03(F)(3)(c) and F(4)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. any monthly record showing the VOC content of Type 1 lubricating oils employed exceeds 6.76 lbs/gallon; and
 - b. any monthly record showing noncompliance with the rolling, 12-month VOC emissions limit of 48.02 tons for emissions units P081 through P104, combined.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-15-03(B)(1)(a)] and [OAC rule 3745-15-03(C)] and [OAC rule 3745-77-07(C)(1)]



f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. VOC Content Limitation:

6.76 lbs VOC/gallon of lubricating oils Type 1

Applicable Compliance Method:

Compliance with this limitation shall be determined through the record keeping requirements established in d) of this permit.

Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit.

b. Emission Limitation:

The combined volatile organic compound (VOC) emissions shall not exceed 48.02 tons as a rolling, 12-month summation for emissions units P081 through P106, inclusive.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emissions limitation shall be determined through the record keeping requirements established in d) of this permit.

[Authority for term 3745-77-07(C)]

g) Miscellaneous Requirements

(1) None.



13. Emissions Unit Group -Stamping Presses 5.75 Lbs VOC/hr:
P107,P108,P109,P110,P111,P112,P113,P114,

EU ID	Operations, Property and/or Equipment Description
P107	Stamping Press 1-261
P108	Stamping Press 1-266
P109	Stamping Press 1-267
P110	Stamping Press 1-290
P111	Stamping Press 1-301
P112	Stamping Press 1-302
P113	Stamping Press 1-227
P114	Stamping Press 1-237

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) b)(1)e., and d)(2).
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC Rule 3745-31-05(A)(3) (PTI 05-13345)	The volatile organic compound (VOC) content of lubricating oils shall not exceed 5.75 pounds per gallon. See Sections c)(1), c)(2), d)(1), e)(1), f)(1)a., and f)(1)b., below.
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid the requirements of 40 CFR Part 63, Subpart MMMM)	See section B.2, 3, and 4, above.
c.	OAC rule 3745-31-05(F)	The combined volatile organic compound (VOC) emissions shall not exceed 10.5 tons as a rolling, 12-month summation for emissions units P107 through P114 and P117 through P140. See Sections d)(1), e)(1), and f)(1)c., below.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-114-01	See Section d)(2), below.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) VOC emissions from emissions units P107 through P114 and P117 through P140 combined shall not exceed 10.5 tons per rolling 12-month period. Emissions shall be calculated according to the following formula:

$$10.5 \text{ tons} \geq \sum_{n=1}^i \frac{(G_i) \times (V_i)}{2000} \text{ lbs/ton}$$

G_i = usage of lubricant i in gallons for the rolling 12-month period

V_i = VOC content of lubricant i in pounds of VOC per gallon, subject to the following limitation: $V_i =$ or < 5.75 lbs VOC/gallon

$i =$ total number of unique lubricants used on emission units emissions units P107 through P114 and P117 through P140 combined.

[Authority for term 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information for emissions units emissions units P107 through P114 and P117 through P140, combined:

a. the company name or identification for each lubricating oil with a VOC content greater than zero (0) employed;

b. whether or not each liquid organic materials employed have boiling points exceeding 200 degrees Fahrenheit at 0.5 millimeter mercury absolute pressure or the materials have been exposed to temperatures exceeding 220 degrees Fahrenheit;

c. the volume, in gallons, of each lubricating oil employed per rolling, 12-month summation;

d. the VOC content of each lubricating oil solvent employed, in pounds per gallon;



- e. the rolling 12-month summation of VOC emissions from the lubricating oils employed, i.e., the sum of the usage of each lubricating oil employed multiplied by its respective VOC content.

[Authority for term 3745-77-07(A)(3)]

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

[ORC 3704.03(F)(3)(c) and F(4)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. any monthly record showing the VOC content of Type 1 lubricating oils employed exceeds 5.75 lbs/gallon; and
 - b. any monthly record showing noncompliance with the rolling, 12-month VOC emissions limit of 10.5 tons for emissions units P107 through P114 and P117 through P140, combined.

[OAC rule 3745-15-03(B)(1)(a)] and [OAC rule 3745-15-03(C)] and [OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. VOC Content Limitation:

5.75 lbs VOC/gallon of lubricating oils

Applicable Compliance Method:

Compliance with this limitation shall be determined through the record keeping requirements established in section d) of this permit.

Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit.



Preliminary Proposed Title V Permit

American Trim L.L.C.

Permit Number: P0115643

Facility ID: 0575010106

Effective Date: To be entered upon final issuance

b. Emission Limitation:

The combined volatile organic compound (VOC) emissions shall not exceed 10.5 tons as a rolling, 12-month summation for emissions units P107 through P114 and P117 through P140, inclusive.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emissions limitation shall be determined through the record keeping requirements established in section d) of this permit.

[Authority for term 3745-77-07(C)]

- (2) Formulation data of or USEPA Method 24 shall be used to determine the VOC content of each lubricating oil material.

[Authority for term 3745-77-07(C)]

g) Miscellaneous Requirements

- (1) None.



**14. Emissions Unit Group -Stamping Presses prior 1970:
P117,P123,P125,P126,P127,P128,P129,P130,P134,P135,P136,P137,P138,P139,P140,**

EU ID	Operations, Property and/or Equipment Description
P117	Stamping Press 1-001
P123	Stamping Press 1-034
P125	Stamping Press 1-052
P126	Stamping Press 1-81
P127	Stamping Press 1-89
P128	Stamping Press 1-90
P129	Stamping Press 1-92
P130	Stamping Press 1-93
P134	Stamping Press 1-129
P135	Stamping Press 1-131
P136	Stamping Press 1-132
P137	Stamping Press 1-133
P138	Stamping Press 1-138
P139	Stamping Press 1-214
P140	Stamping Press 1-250

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) b)(1)d., and d)(2).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) (Synthetic minor to avoid the requirements of 40 CFR Part 63, Subpart Mmmm)	See section B.2, 3, and 4, above.
b.	OAC rule 3745-31-05(F)	The combined volatile organic compound (VOC) emissions shall not exceed 10.5 tons as a rolling, 12-month summation for emissions units P107 through P114 and P117 through P140.
c.	OAC rule 3745-114-01	See Section d)(2), below.



(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) VOC emissions from emissions units P107 through P114 and P117 through P140 combined shall not exceed 10.5 tons per rolling 12-month period. Emissions shall be calculated according to the following formula:

$$10.5 \text{ tons} \geq \sum_{n=1}^i \frac{(G_i) \times (V_i)}{2000} \text{ lbs/ton}$$

G_i = usage of lubricant i in gallons for the rolling 12-month period

V_i = VOC content of lubricant i in pounds of VOC per gallon, subject to the following limitation: $V_i =$ or $<$ 5.75 lbs VOC/gallon

i = total number of unique lubricants used on emission units emissions units P107 through P114 and P117 through P140 combined.

[Authority for term 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information for emissions units emissions units P107 through P114 and P117 through P140, combined:

a. the company name or identification for each lubricating oil with a VOC content greater than zero (0) employed;

b. whether or not each liquid organic materials employed have boiling points exceeding 200 degrees Fahrenheit at 0.5 millimeter mercury absolute pressure or the materials have been exposed to temperatures exceeding 220 degrees Fahrenheit;

c. the volume, in gallons, of each lubricating oil employed per rolling, 12-month summation;

d. the VOC content of each lubricating oil solvent employed, in pounds per gallon;

e. the rolling 12-month summation of VOC emissions from the lubricating oils employed, i.e., the sum of the usage of each lubricating oil employed multiplied by its respective VOC content.

[Authority for term 3745-77-07(A)(3)]



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

[ORC 3704.03(F)(3)(c) and F(4)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. any monthly record showing noncompliance with the rolling, 12-month VOC emissions limit of 10.5 tons for emissions units P107 through P114 and P117 through P140, combined; and
 - b. any monthly record showing noncompliance with the liquid organic material usage limitation for this emissions unit, i.e., liquid organic materials must not be exposed to temperatures exceeding 220 degrees Fahrenheit and the boiling points must exceed 200 degrees at 0.5 millimeter mercury absolute pressure per OAC rule 3745-21-07(G)(9)(e); and

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-15-03(B)(1)(a)] and [OAC rule 3745-15-03(C)] and [OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

The combined volatile organic compound (VOC) emissions shall not exceed 10.5 tons as a rolling, 12-month summation for emissions units P107 through P114 and P117 through P140, inclusive.

Applicable Compliance Method:

Compliance with the rolling, 12-month VOC emissions limitation shall be determined through the record keeping requirements established in section d) of this p[Authority for term 3745-77-07(C)]ermit.



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- (2) Formulation data of or USEPA Method 24 shall be used to determine the VOC content of each lubricating oil material.

[Authority for term 3745-77-07(C)]

- g) Miscellaneous Requirements.

- (1) None.