



5/5/2014

Mr. Phil Roby
TS TRIM INDUSTRIES, INC.
6380 Canal Street
Canal Winchester, OH 43110-9640

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0125031840
Permit Number: P0116059
Permit Type: OAC Chapter 3745-31 Modification
County: Franklin

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Columbus Dispatch. A copy of the public notice and the draft permit are enclosed. 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 draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall Permit Review/Development Section Ohio EPA, DAPC 50 West Town Street Suite 700 PO Box 1049 Columbus, Ohio 43216-1049	and	Ohio EPA DAPC, Central District Office 50 West Town Street, 6th Floor P.O. Box 1049 Columbus, OH 43216-1049
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Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification
Ohio EPA-CDO

PUBLIC NOTICE

5/5/2014 Issuance of Draft Air Pollution Permit-To-Install and Operate

TS TRIM INDUSTRIES, INC.

6380 Canal Street,

Canal Winchester, OH 43110-9640

Franklin County

FACILITY DESC.: Other Motor Vehicle Electrical and Electronic Equipment Manufacturing

PERMIT #: P0116059

PERMIT TYPE: OAC Chapter 3745-31 Modification

PERMIT DESC: Chapter 31 Modification of a tabletop flaw spray booth

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: John Walker, Ohio EPA DAPC, Central District Office, 50 West Town Street, 6th Floor P.O. Box 1049, Columbus, OH 43216-1049. Ph: (614)728-3778



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

TS Trim Industries, Inc. at 6380 Canal Street in Canal Winchester, OH produces resin molding for cars. It has applied for a PTIO for enclosing a flaw spray process that is currently known as by emission unit (EU) R029 and will now be vented externally through the roof. The process consists of aerosol spray cans of Per-Fix Color Match being manually sprayed to fix flaws in finished products.

3. Facility Emissions and Attainment Status:

This process will emit volatile organic compounds (VOC's), which is a precursor for ozone from the aerosol spray cans being used in the process. TS Trim Industries, Inc. is a synthetic minor facility and is located in Franklin County, which is marginal non-attainment for ozone and non-attainment for PE 2.5 or smaller. R029 was installed before the issuance of this permit, so its fees will be doubled.

4. Source Emissions:

R029: VOC Potential

1.95 lbs of VOC/hr and 8.56 TPY VOC

Or

0.713 tons of VOC/month, averaged over a 12-month rolling period (based on PTE)

Applicable Compliance Method:

VOC emissions from the flaw spray line shall be calculated as follows:

Maximum VOC content of coatings

$(6.41 \text{ lbs/gal})(78\% \text{ max \% VOC}) = 5.00 \text{ lbs/gal}$

Maximum Coating Usage = 75 cans/day

$(75 \text{ cans/day})(16 \text{ oz/can})(\text{gal}/128\text{oz})(365 \text{ days/yr}) = 3,422 \text{ gal/yr}$

$(5.00 \text{ lbs VOC/gal})(3,422 \text{ gal/yr})(\text{ton}/2,000\text{lbs}) = 8.56 \text{ TPY VOC}$

Facility Wide VOC restriction: (Facility requested 85 TPY)*



R029: HAP's Potential

Total Gals of Per-Fix Color Match Spray a year = (75 cans/day)(16 oz/can)(gal/128 oz)(365 days/yr)
 =3,422 gal/yr

Xylene = (3,422 gal/yr)(6.41 lbs/gal) = 21,935 lbs/yr (10% wt max) = 2,194 lbs/yr
 (2,194 lbs/yr)(ton/2,000lbs) = **1.10 TPY**

Ethyl benzene = (3,422 gal/yr)(6.41 lbs/gal) = 21,935 lbs/yr (1.0% wt max) = 219 lbs/yr
 (219 lbs/yr)(ton/2,000lbs) = **0.11 TPY**

Highest Single HAP (Xylene) = 1.10 TPY
 Combined HAP's = 1.21 TPY

Xylene TLV = (100 ppm*106.16)/24.45 = 434.2 mg/m³
 Xylene MAGLC = TLV/42 = ((434.2 mg/m³)/42) = 10.34 mg/m³ (1,000) = 10,337.9 ug/m³

R029: PE Potential

Less than 10 lbs/day

Calculations:

Solid content of coating = 1%

Density of Coating = 6.41 lbs/gal

(0.01)(6.41 lbs) = 0.0641 lbs PE/gal

(0.0641 lbs PE/gal)(75 cans/day*16 oz/can*gal/128 oz) = 0.601 lbs PE/day

*Note: PE calculation was a rough estimate as it does not take into account transfer efficiency or control, which would lower the PE further.

5. Conclusion:

Permit recordkeeping, while maintaining compliance with other terms and conditions in the permit, should ensure compliance with applicable state and federal rules. Modeling indicates that there is little risk.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	8.56
HAP (combined)	1.21
HAP (xylene)	1.1



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
TS TRIM INDUSTRIES, INC.**

Facility ID:	0125031840
Permit Number:	P0116059
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	5/5/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
TS TRIM INDUSTRIES, INC.

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Draft Permit-to-Install and Operate

TS TRIM INDUSTRIES, INC.

Permit Number: P0116059

Facility ID: 0125031840

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0125031840
Application Number(s): A0050546
Permit Number: P0116059
Permit Description: Chapter 31 Modification of a tabletop flaw spray booth
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$400.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 5/5/2014
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

TS TRIM INDUSTRIES, INC.
6380 Canal Street
Canal Winchester, OH 43110-9640

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

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

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director



Draft Permit-to-Install and Operate

TS TRIM INDUSTRIES, INC.

Permit Number: P0116059

Facility ID: 0125031840

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0116059

Permit Description: Chapter 31 Modification of a tabletop flaw spray booth

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	R029
Company Equipment ID:	Flaw Spray Booth
Superseded Permit Number:	01-12182
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install and Operate

TS TRIM INDUSTRIES, INC.

Permit Number: P0116059

Facility ID: 0125031840

Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the “Authorization” page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Central District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit 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.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the



Draft Permit-to-Install and Operate

TS TRIM INDUSTRIES, INC.

Permit Number: P0116059

Facility ID: 0125031840

Effective Date: To be entered upon final issuance

change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



Draft Permit-to-Install and Operate
TS TRIM INDUSTRIES, INC.
Permit Number: P0116059
Facility ID: 0125031840
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B. Facility-Wide Terms and Conditions



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) B.2. thru B.5.
2. The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units R029, R030, R035, other de minimis air contaminant sources, as defined in OAC rule 3745-15-05, and other air contaminant sources exempt from the requirement to obtain a permit-to-install pursuant to OAC rule 3745-31-03 installed subsequent to the issuance of this permit, combined, shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

The permittee has existing records of existing sources to demonstrate compliance with this limitation upon issuance of this permit.
3. The permittee shall collect and record the following information each month for the emissions units identified in 2. above:
 - a) the name and identification number of each coating, as applied;
 - b) the individual Hazardous Air Pollutant (HAP)* content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;
 - c) the total combined HAP content of each coating in pounds of combined HAP's per gallon of coating, as applied [sum all the individual HAP contents from b)];
 - d) the VOC content for each coating and cleanup material in pounds of VOC per gallon of coating and cleanup material, excluding water, as applied;
 - e) the number of gallons applied, of each coating and cleanup material, excluding water, as applied;
 - f) the total individual HAP usage for each HAP from all coatings, in pounds or tons per month [for each HAP the sum of b) times e) for each material (and divided by 2,000 lbs/ton if the units are in tons)];
 - g) the total combined HAP usage from all coatings processed, in pounds or tons per month [the sum of c) times e) for each coating (and divided by 2,000 lbs/ton if the units are in tons)];



- h) the updated rolling, 12-month summation of usage for each individual HAP emissions*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months;
- i) the updated rolling, 12-month summation of usage for total combined HAP emissions*, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
- j) the updated rolling, 12-month summation of usage for total VOC emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

Monthly records shall be completed within 15 days following the end of each calendar month.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting Ohio EPA, Central District Office (CDO). Material Safety Data Sheets typically include a listing of the solvents contained in the coatings and cleanup materials.

* This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporated.

- 4. The permittee shall submit quarterly deviation (excursion) reports which identify:
 - a) Any exceedance of the rolling, 12-month HAP emission limitations outlined in 2. above;
 - 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 reports shall be submitted to the Director (Ohio EPA, CDO) by February 15, May 15, August 15, and November 15 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively).

- 5. Compliance with the emission limitations in 2. of these terms and conditions shall be determined in accordance with the following method(s) identified below:
 - a) Emission Limitation:

Actual emissions of Hazardous Air Pollutants (HAPs) shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, as a 12-month rolling summation, as specified in 2. above.



Draft Permit-to-Install and Operate

TS TRIM INDUSTRIES, INC.

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Applicable Compliance Method:

Compliance with the 12-month rolling HAP limitations shall be demonstrated by the record keeping identified in 3. above.

b) Emission Limitation:

Actual emissions of VOC's shall not exceed 85 TPY VOC, as a 12-month rolling summation, as specified in 2. above.

Applicable Compliance Method:

Compliance with the 12-month rolling VOC limitation shall be demonstrated by the record keeping identified in 3. above.



Draft Permit-to-Install and Operate
TS TRIM INDUSTRIES, INC.
Permit Number: P0116059
Facility ID: 0125031840
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. R029, Flaw Spray Booth

Operations, Property and/or Equipment Description:

Table top flaw spray booth

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)a., d(8), d(9), d(10), d(11), and e(2)

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. 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), as effective 11/30/01	Emissions shall not exceed: 0.713 tons of VOC/month averaged over a 12-month, rolling period. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)b.
c.	OAC rule 3745-17-11(C)	See c)(1), d(3), d(4), d(5), d(6), and d(7)
d.	ORC 3704.03(F)(4)(c) (Toxic Air Contaminants)	See d(8), d(9), d(10), d(11), and e(2)

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265



changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan (SIP).

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the volatile organic compounds (VOC's) from this air contaminant source since the uncontrolled potentials to emit for VOC's are each less than 10 tons/year.

- c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

- d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information daily for this emission unit:
 - a. the name and identification of each coating and cleanup material, as applied;
 - b. the VOC content for each coating and cleanup material in pounds of VOC per gallon of coating, excluding water, as applied; and
 - c. the number of gallons applied, of each coating and cleanup material, excluding water, as applied.
- (2) The permittee shall collect and record the following information each month for this emissions unit:
 - a. the rolling, 12-month summation of the coating and cleanup usage, in gallons, excluding water;
 - b. the total VOC emissions rate for all coating and cleanup materials, in pounds per rolling, 12-month summation $[d](1)(b) \times [d](2)(a)$; and
 - c. the monthly VOC emissions rate for all coating and cleanup materials, averaged over a 12-month period, in tons $[d](2)(b)/12$ months.



- (3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to Ohio EPA, CDO.
- (4) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to Ohio EPA upon request.
- (5) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (6) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to Ohio EPA, CDO.

- (7) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to Ohio EPA upon request.
- (8) The permit-to-install and operate (PTIO) application for this/these emissions unit(s), R029, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:



- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "24" hours per day and "7" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant:

xylene

TLV (mg/m³):

xylene 434.2 mg/m³

Maximum Hourly Emission Rate (lbs/hr):

xylene 0.24 lbs/hr

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

xylene 191.82 ug/m³



MAGLC (ug/m3):

xylene 10,337.9 ug/m³

The permittee, has demonstrated that emissions of xylene, from emissions unit(s) R029, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

- (9) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (10) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);



- b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- (11) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- e) Reporting Requirements
- (1) 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 District Office or Local Air Agency, 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 signatory authority may be represented as provided through procedures established in Air Services.
 - (2) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.



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:

0.713 tons of VOC/month averaged over a 12-month, rolling period.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(2)c.above.

g) Miscellaneous Requirements

(1) None.