



7/3/2014

Certified Mail

Michael Desgranges  
 STANLEY ELECTRIC US COMPANY  
 420 East High Street  
 London, OH 43140

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL  
 Facility ID: 0149000089  
 Permit Number: P0116631  
 Permit Type: Initial Installation  
 County: Madison

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

**How to appeal this permit**

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
 77 South High Street, 17th Floor  
 Columbus, OH 43215

## **How to save money, reduce pollution and reduce energy consumption**

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://www.ohioairquality.org/clean_air)

## **How to give us feedback on your permitting experience**

Please complete a survey at [www.epa.ohio.gov/survey.aspx](http://www.epa.ohio.gov/survey.aspx) and give us feedback on your permitting experience. We value your opinion.

## **How to get an electronic copy of your permit**

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA  
Ohio EPA-CDO



## Response to Comments

Facility ID:	0149000089
Facility Name:	STANLEY ELECTRIC US COMPANY
Facility Description:	Vehicular lighting equipment
Facility Address:	420 East High Street London, OH 43140 Madison County
Permit:	P0116631, Permit-To-Install - Initial Installation
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Madison Press on 05/23/2014. The comment period ended on 06/22/2014.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

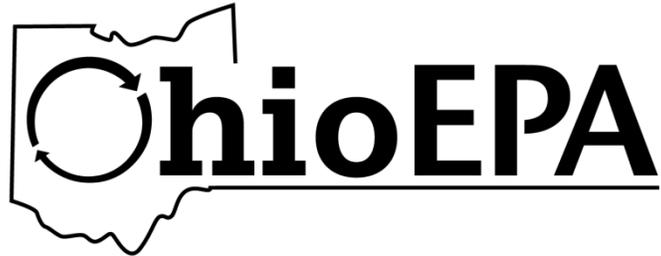
The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns 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





**FINAL**

**Division of Air Pollution Control  
Permit-to-Install  
for  
STANLEY ELECTRIC US COMPANY**

Facility ID:	0149000089
Permit Number:	P0116631
Permit Type:	Initial Installation
Issued:	7/3/2014
Effective:	7/3/2014





**Division of Air Pollution Control**  
**Permit-to-Install**  
for  
STANLEY ELECTRIC US COMPANY

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**Final Permit-to-Install**  
STANLEY ELECTRIC US COMPANY  
**Permit Number:** P0116631  
**Facility ID:** 0149000089  
**Effective Date:** 7/3/2014

## Authorization

Facility ID: 0149000089  
Facility Description: Vehicular lighting equipment  
Application Number(s): A0050430  
Permit Number: P0116631  
Permit Description: Installation PTI for four coating lines with coating booth, infrared oven and UV cure vented to a regenerative thermal oxidizer.  
Permit Type: Initial Installation  
Permit Fee: \$800.00  
Issue Date: 7/3/2014  
Effective Date: 7/3/2014

This document constitutes issuance to:

STANLEY ELECTRIC US COMPANY  
420 East High Street  
London, OH 43140

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

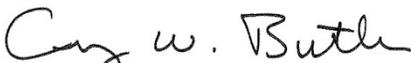
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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 a Permit-to-Install for the 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 emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Craig W. Butler  
Director



## Authorization (continued)

Permit Number: P0116631  
 Permit Description: Installation PTI for four coating lines with coating booth, infrared oven and UV cure vented to a regenerative thermal oxidizer.

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

**Group Name: PES Lines 1 through 4**

<b>Emissions Unit ID:</b>	<b>R045</b>
Company Equipment ID:	PES line 1
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>R046</b>
Company Equipment ID:	PES line 2
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>R047</b>
Company Equipment ID:	PES line 3
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>R048</b>
Company Equipment ID:	PES line 4
Superseded Permit Number:	
General Permit Category andType:	Not Applicable



**Final Permit-to-Install**  
STANLEY ELECTRIC US COMPANY  
**Permit Number:** P0116631  
**Facility ID:** 0149000089  
**Effective Date:** 7/3/2014

## **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.2.a), Severability Clause
  - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
  - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
  - (4) Standard Term and Condition A.9., Reporting Requirements
  - (5) Standard Term and Condition A.10., Applicability
  - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
  - (7) Standard Term and Condition A.14., Public Disclosure
  - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (9) Standard Term and Condition A.16., Fees
  - (10) Standard Term and Condition A.17., Permit Transfers

## **2. Severability Clause**

- a) 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.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

## **3. 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 re-issuance, or modification.



- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. 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 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.

#### **4. Monitoring and Related Record Keeping and Reporting Requirements**

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - (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.
- 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, 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.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Central District Office.



- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Central District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
  - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the Ohio EPA DAPC, Central District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
  - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## **5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Central District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

## **6. Compliance Requirements**

- a) 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 appropriate Ohio EPA District Office or contracted



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 electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

Any document (including reports) required to be submitted and required by a federally applicable requirement in this 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 ORC section 3704.08.
  - (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, Central 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.

## **7. Best Available Technology**

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.



**8. 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.

**9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Central District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Central District Office. 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.)

**10. Applicability**

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s) not exempt from the requirement to obtain a Permit-to-Install.

**11. Construction of New Sources(s) and Authorization to Install**

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the



Director within a reasonable time before the termination date and the permittee shows good cause for any such extension.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized 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 authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

Unless otherwise exempted, no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

## **12. Permit-To-Operate Application**

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d) must be obtained before operating the source in a manner that would violate the existing Title V permit requirements.



**13. Construction Compliance Certification**

The applicant shall identify the following dates in the "Air Services" facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

**14. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

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

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.

**16. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in "Air Services" once the transfer is legally completed. The change must be submitted through "Air Services" within thirty days of the ownership transfer date.

**18. Risk Management Plans**

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

**19. 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.



**Final Permit-to-Install**  
STANLEY ELECTRIC US COMPANY  
**Permit Number:** P0116631  
**Facility ID:** 0149000089  
**Effective Date:** 7/3/2014

## **B. Facility-Wide Terms and Conditions**



**Final Permit-to-Install**  
STANLEY ELECTRIC US COMPANY  
**Permit Number:** P0116631  
**Facility ID:** 0149000089  
**Effective Date:** 7/3/2014

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 following emissions units contained in this permit are subject to MACT Subpart P: R045, R046, R047, and R048. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Central District Office.



**Final Permit-to-Install**  
STANLEY ELECTRIC US COMPANY  
**Permit Number:** P0116631  
**Facility ID:** 0149000089  
**Effective Date:** 7/3/2014

## **C. Emissions Unit Terms and Conditions**



**1. Emissions Unit Group -PES Lines 1 through 4: R045,R046,R047,R048,**

EU ID	Operations, Property and/or Equipment Description
R045	PES Line 1, paint spray booth, infrared flash oven, UV cure oven, vacuum metalization and assembly operations vented to a regenerative thermal oxidizer.
R046	PES Line 2, paint spray booth, infrared flash oven, UV cure oven, vacuum metalization and assembly operations vented to a regenerative thermal oxidizer.
R047	PES Line 3, paint spray booth, infrared flash oven, UV cure oven, vacuum metalization and assembly operations vented to a regenerative thermal oxidizer.
R048	PES Line 4, paint spray booth, infrared flash oven, UV cure oven, vacuum metalization and assembly operations vented to a regenerative thermal oxidizer.

- 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 b)(2)g.
- 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 November 30, 2001	<p>Volatile organic compound (VOC) emissions shall not exceed 0.27 tons per rolling, 12-month period from the coating and cleanup material usage and from the combustion of natural gas in the regenerative thermal oxidizer (RTO).</p> <p>Emissions of particulate matter less than 10 microns in aerodynamic diameter (PM<sub>10</sub>) shall not exceed 0.12 tons per rolling, 12-month period from the coating operation and from the combustion of natural gas in the RTO.</p> <p>Emissions of particulate matter less than 2.5 microns in aerodynamic diameter (PM<sub>2.5</sub>) shall not exceed 0.12 tons per rolling, 12-month period from the coating operation and from the combustion of natural gas in the RTO.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Emissions from the combustion of natural gas in the RTO serving this emissions unit shall not exceed the following:</p> <p>Nitrogen oxides (NO<sub>x</sub>) emissions shall not exceed 1.29 tons per rolling, 12-month period.</p> <p>Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 0.008 tons per rolling, 12-month period.</p> <p>Carbon monoxide (CO) emissions shall not exceed 1.08 tons per rolling, 12-month period.</p> <p>Lead emissions shall not exceed 6.4E-6 tons per rolling, 12-month period.</p> <p>See b)(2)a. and b)(2)c.</p>
b.	OAC rule 3745-31-05(A)(3), as effective December 1, 2006	See b)(2)b.
c.	OAC rule 3745-31-05(D) (Synthetic minor to avoid NANSR)	<p>VOC emissions from the coating operation shall not exceed 0.20 tons per rolling, 12-month period, including cleanup materials.</p> <p>VOC emissions from the coating operation shall be reduced by an overall control efficiency of at least 95%.</p> <p>See b)(2)d., c)(3) through c)(6)</p>
d.	OAC rule 3745-17-11(C)	See c)(1) and c)(2)
e.	40 CFR Part 63, Subpart PPPP	See b)(2)e.
f.	40 CFR Part 63, Subpart A (40 CFR Part 63.1-16)	See b)(2)f.
g.	ORC 3704.03(F)	See b)(2)g.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) rule 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 the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards



(NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a 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. When U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

- b. The following rule paragraph will apply when U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan:
  - i. The best available technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the NO<sub>x</sub>, SO<sub>2</sub>, CO, VOC, PM<sub>10</sub>, PM<sub>2.5</sub>, and lead emissions from this air contaminant source because the uncontrolled potential to emit for each pollutant is less than 10 tons per year (TPY).
- c. The rolling, 12-month emissions limitations from the combustion of natural gas in the RTO for NO<sub>x</sub>, SO<sub>2</sub>, CO, and lead emissions were established to reflect the potential to emit. It is not necessary to establish monitoring, recordkeeping, or reporting requirements in order to demonstrate compliance with these limitations.
- d. A permanent total enclosure shall be constructed to totally enclose the application stations, coating reservoirs, and all areas from the application station to the oven and the control device, such that all volatile organic compound emissions are captured, contained, and directed to the control device whenever the emissions unit is in operation.

The permanent total enclosure shall be maintained under negative pressure whenever the emissions unit is in operation, and shall be designed and maintained to have an average facial velocity of air through each natural draft opening of at least 200 feet per minute (3,600 m/hr). Compliance with the average facial velocity shall be demonstrated during the compliance test, by either using an air flow monitor or a differential pressure gauge at each natural draft opening, and maintaining the required facial velocity or the corresponding negative pressure. The permanent total enclosure shall meet all of the following criteria if the capture efficiency of the enclosure and control device is to be assumed to be 100%:

- i. Any natural draft opening shall be at least four equivalent opening diameters, or 4 times the diameter of the opening, from each VOC emitting point. An equivalent diameter is the diameter of a circle that has the same area as the opening. If the opening is not circular the equivalent diameter (ED) is calculated as follows:

$$ED = (4 \text{ area} / \pi)^{0.5}$$

- ii. The total area of all natural draft openings (A<sub>N</sub>) shall not exceed 5 percent of the total surface area of the enclosure (A<sub>T</sub>), i.e., the four walls, floor, and



ceiling. The natural draft opening to enclosure area ratio (NEAR) is calculated as follows:

$$\text{NEAR} = A_N / A_T$$

- iii. The direction of air flow through all natural draft openings shall be into the enclosure, with an average facial velocity of no less than 200 feet per minute (3,600 m/hr) or a pressure drop of 0.013 mm Hg (0.007 in. H<sub>2</sub>O).
- iv. All access doors and windows to the enclosure that do not meet the requirements of a natural draft opening and whose surface areas are not included in the 5 percent surface area determination in "b" shall be completely closed to any air movement during process operations.
- v. All VOC emissions shall be captured and contained for discharge through the control device.

The permanent total enclosure (PTE) serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a permanent total enclosure in 40 CFR, Part 51, Appendix M, Reference Method 204, and shall capture all of the VOC emissions from this emissions unit.

- e. The facility is subject to the following applicable emissions limitation(s) identified in 40 CFR Part 63, Subpart PPPP, Section 63.4490(b)(2):
  - i. For each existing automotive lamp coating affected source, limit organic HAP emissions to no more than 0.45 kg (0.45lb) per kg (lb) coating solids used during each 12-month compliance period.
  - f. Table 2 to subpart PPPP of 40 CFR Part 63 - "Applicability of General Provisions (Subpart A) to subpart PPPP of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.
  - g. 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 a permittee to apply for and obtain a new or modified permit-to-install (PTI) 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 PTI.
- c) Operational Restrictions
  - (1) The permittee shall install and operate a 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.



- (2) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.
- (3) The maximum annual coating usage for this emissions unit shall not exceed 1,051 gallons per rolling, 12-month period.

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

Month(s)	Maximum Allowable Coating Usage (gallons)
1	88
1 - 2	175
1 - 3	263
1 - 4	350
1 - 5	438
1 - 6	525
1 - 7	613
1 - 8	700
1 - 9	788
1 - 10	875
1 - 11	963
1 - 12	1,051

- (4) The VOC content of any coating utilized in this emissions unit shall not exceed 4.8 pounds of VOC per gallon (lbs VOC/gal).
- (5) The maximum annual cleanup material usage for this emissions unit shall not exceed 420 gallons per rolling, 12-month period.

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



Month(s)	Maximum Allowable Coating Usage (gallons)
1	35
1 - 2	70
1 - 3	105
1 - 4	140
1 - 5	175
1 - 6	210
1 - 7	245
1 - 8	280
1 - 9	315
1 - 10	350
1 - 11	385
1 - 12	420

- (6) The VOC content of any cleanup material utilized in this emissions unit shall not exceed 6.68 pounds of VOC per gallon (lbs VOC/gal).
  - (7) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart PPPP.
  - (8) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.
- 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 for each coating employed;
    - b. the name and identification number for each cleanup material employed;
    - c. the number of gallons of each coating employed;
    - d. the number of gallons of each cleanup material employed;



- e. the VOC content of each coating, in pounds of VOC per gallon;
  - f. the VOC content of each cleanup material, in pounds of VOC per gallon;
  - g. if a credit to emissions from recovered materials is to be used in emission calculations, the number of gallons of each material reclaimed for off-site recycle, recovery, and/or disposal from the emissions unit;
  - h. the total uncontrolled monthly VOC emissions from coatings, in tons;
  - i. the total uncontrolled monthly VOC emissions from cleanup materials, in tons;
  - j. the total controlled monthly VOC emissions from coatings, in tons. The controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance;
  - k. the total controlled monthly VOC emissions from cleanup materials, in tons. The controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance;
  - l. the total controlled monthly VOC emissions from coatings and cleanup materials combined [i.e., the sum of d)(1)j. and d)(1)k.]; and
  - m. the total controlled rolling, 12-month VOC emissions from coatings and cleanup materials combined, in tons [i.e., the result of d)(1)l. added to the previous 11 months].
- (2) 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 the Ohio EPA Central District Office upon request.
- (3) 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 the Ohio EPA upon request.
- (4) 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.
- (5) 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 the appropriate Ohio EPA District Office or local air agency upon request.

- (6) 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 the Ohio EPA upon request.
- (7) The permittee shall measure, document/calculate, and maintain a permanent record of the following information for the permanent total enclosure, which may be the same record documented during the compliance test(s):
  - a. the measured diameter of each natural draft opening;
  - b. the distance measured from each natural draft opening to each VOC emitting point;
  - c. the total calculated surface area of all natural draft openings and the surface area of the enclosure's four walls, floor, and ceiling;
  - d. the calculation or demonstration that the distance from each VOC emitting point to each natural draft opening is at least 4 times the diameter of the opening; and
  - e. the calculation demonstrating that the sum of the surface areas of all of the natural draft openings to the enclosure is not more than 5 percent of the sum of the surface areas of the enclosure's four walls, floor, and ceiling.
- (8) The permittee shall install, operate, and maintain monitoring devices and a recorder that continuously monitor and record the differential pressure between the inside and outside of the permanent total enclosure when the emissions unit is in operation. The monitoring and recording devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day:

- a. all three-hour blocks of time during which the difference in pressure between the permanent total enclosure and the surrounding areas is not maintained at or



above the minimum pressure differential of 0.007 inches of water, as a three-hour average; and

- b. a log or record of downtime for the capture (collection) system when the emissions unit was in operation.
- (9) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance. Until compliance testing has been conducted, the thermal oxidizer shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manual.
- (10) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured or  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The acceptable temperature setting shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate temperature range is established to demonstrate compliance. Following compliance testing, the permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
- a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and
  - b. a log or record of the operating time for the capture (collection) system, thermal oxidizer, monitoring equipment, and the associated emissions unit(s).

These records shall be maintained at the facility for a period of three years.

- (11) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
- a. the date and time the deviation began;
  - b. the magnitude of the deviation at that time;



- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the temperature readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (12) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart PPPP.
- (13) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.



- (2) The permittee shall submit quarterly deviation (excursion) reports 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:
    - i. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation;
    - ii. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the emissions were not captured and directed to the RTO;
    - iii. each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizer was outside of the range specified by the manufacturer and/or outside of the acceptable range following any required compliance demonstration;
    - iv. each incident of deviation described in "ii" or "iii" (above) where a prompt investigation was not conducted;
    - v. each incident of deviation described in "ii" or "iii" where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken;
    - vi. each incident of deviation described in "ii" or "iii" where proper records were not maintained for the investigation and/or the corrective action(s);
    - vii. all three-hour blocks of time, when the emissions unit was in operation, during which the permanent total enclosure was not maintained at the minimum pressure differential of 0.007 inches of water;
    - viii. each rolling, 12-month period during which the coating usage from this emissions unit exceeded 1,051 gallons, and for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative coating usage levels for each month;
    - ix. any record demonstrating that the coating VOC content limitation of 4.8 lbs VOC/gal was exceeded;
    - x. each rolling, 12-month period during which the cleanup material usage from this emissions unit exceeded 420 gallons, and for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative cleanup material usage levels for each month;



- xi. any record demonstrating that the cleanup material VOC content limitation of 6.68 lbs VOC/gal was exceeded; and
- xii. each rolling, 12-month period during which the VOC emissions from this emissions unit, including cleanup materials, exceeded 0.20 tons.

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 (Central District Office).

- (3) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart PPPP.
- (4) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

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. Emissions limitations:

Emissions from natural gas combustion in the RTO serving this emissions unit shall not exceed the following: (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP):

- NO<sub>x</sub> emissions shall not exceed 1.29 tons per rolling, 12-month period.
- SO<sub>2</sub> emissions shall not exceed 0.008 tons per rolling, 12-month period.
- CO emissions shall not exceed 1.08 tons per rolling, 12-month period.
- Lead emissions shall not exceed 6.4E-6 tons per rolling, 12-month period.

Applicable Compliance Method:

The rolling, 12-month emissions limitations were established by multiplying the maximum heat input capacity for the RTO burner (3MMBtu) by the following emissions factors from AP-42, Volume I, Fifth Edition, Section 1.4, "Natural Gas Combustion", Tables 1.4-1 and 1.4-2, July 1998:

<u>Pollutant</u>	<u>Emissions Factor</u>
NO <sub>x</sub>	0.09803 lb/MMBtu
SO <sub>2</sub>	0.00059 lb/MMBtu
CO	0.08235 lb/MMBtu
Lead	4.9E-7 lb/MMBtu



The resulting hourly rate was then multiplied by the maximum number of hours in a year (8,760) and converted to tons by dividing by 2,000.

b. Emissions Limitation:

VOC emissions shall not exceed 0.27 tons per rolling, 12-month period from the coating and cleanup material usage and from the combustion of natural gas in the RTO (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method:

The rolling 12-month VOC emissions limitation was established by summing the VOC emissions from the coating and cleanup material usage and the VOC emissions from the combustion of natural gas in the RTO.

VOC emissions from the coating and cleanup material usage shall be based upon the record keeping specified in d)(1).

VOC emissions from the combustion of natural gas in the RTO were established by multiplying the maximum heat input capacity for the RTO burner (3MMBtu) by the following emissions factors from AP-42, Volume I, Fifth Edition, Section 1.4, "Natural Gas Combustion", Tables 1.4-1 and 1.4-2, July 1998 for the VOC emissions from the combustion of natural gas in the RTO:

<u>Pollutant</u>	<u>Emissions Factor</u>
VOC	0.00539 lb/MMBtu

The resulting hourly rate was then multiplied by the maximum number of hours in a year (8,760), converted to tons by dividing by 2,000.

c. Emissions Limitation:

PM<sub>10</sub> shall not exceed 0.12 tons per rolling, 12-month period from the coating usage and from the combustion of natural gas in the RTO (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method:

The rolling, 12-month PM<sub>10</sub> emissions limitation was established by summing the PM<sub>10</sub> emissions from the coating operation and the PM<sub>10</sub> emissions from the combustion of natural gas in the RTO.

PM<sub>10</sub> emissions from the coating operation were established by multiplying the coating solids content (1.87 lbsPM<sub>10</sub>/gallon) by the maximum coating application rate (0.12 gallons/hr) using an estimated transfer efficiency of 65% and a particulate control efficiency of 95%.

$$1.87 \text{ lbsPM}_{10}/\text{gallon} * 0.12 \text{ gallons/hr} * (1 - 0.65) * (1 - 0.95) = 0.004 \text{ lbsPM}_{10}/\text{hr}$$



The resulting hourly rate was then multiplied by the maximum number of hours in a year (8,760), converted to tons by dividing by 2,000.

PM<sub>10</sub> emissions from the combustion of natural gas in the RTO were established by multiplying the maximum heat input capacity for the RTO burner (3MMBtu) by the following emissions factors from AP-42, Volume I, Fifth Edition, Section 1.4, "Natural Gas Combustion", Tables 1.4-1 and 1.4-2, July 1998 for the VOC emissions from the combustion of natural gas in the RTO:

<u>Pollutant</u>	<u>Emissions Factor</u>
PM <sub>10</sub>	0.00745 lb/MMBtu

The resulting hourly rate was then multiplied by the maximum number of hours in a year (8,760), converted to tons by dividing by 2,000.

d. Emissions Limitation:

PM<sub>2.5</sub> shall not exceed 0.12 tons per rolling, 12-month period from the coating usage and from the combustion of natural gas in the RTO (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method:

The rolling, 12-month PM<sub>2.5</sub> emissions limitation was established by summing the PM<sub>2.5</sub> emissions from the coating operation and the PM<sub>2.5</sub> emissions from the combustion of natural gas in the RTO.

PM<sub>2.5</sub> emissions from the coating operation were established by multiplying the coating solids content (1.87 lbsPM<sub>2.5</sub>/gallon) by the maximum coating application rate (0.12 gallons/hr) using an estimated transfer efficiency of 65% and a particulate control efficiency of 95%.

$$1.87 \text{ lbsPM}_{2.5}/\text{gallon} * 0.12 \text{ gallons/hr} * (1 - 0.65) * (1 - 0.95) = 0.004 \text{ lbsPM}_{2.5}/\text{hr}$$

The resulting hourly rate was then multiplied by the maximum number of hours in a year (8,760), converted to tons by dividing by 2,000.

PM<sub>2.5</sub> emissions from the combustion of natural gas in the RTO were established by multiplying the maximum heat input capacity for the RTO burner (3MMBtu) by the following emissions factors from AP-42, Volume I, Fifth Edition, Section 1.4, "Natural Gas Combustion", Tables 1.4-1 and 1.4-2, July 1998 for the VOC emissions from the combustion of natural gas in the RTO:

<u>Pollutant</u>	<u>Emissions Factor</u>
PM <sub>2.5</sub>	0.00745 lb/MMBtu

The resulting hourly rate was then multiplied by the maximum number of hours in a year (8,760), converted to tons by dividing by 2,000.



e. Emissions Limitation:

VOC emissions from the coating operation shall not exceed 0.20 tons per rolling, 12-month period, including cleanup materials.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(1).

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 9 months after permit issuance;
- b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for volatile organic compounds;
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Method 18, Method 25, or Method 25A of 40 CFR, Part 60, Appendix A.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency;
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s);
- f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment; and
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.



- (3) The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPAs "Guidelines for Determining Capture Efficiency", dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)
  - (4) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
  - (5) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart PPPP.
  - (6) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.
- g) Miscellaneous Requirements
- (1) None.