

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

Permit To Install **13-04284**

**A. Source Description**

Dawn Enterprises is a plastics production and coating facility. They seek a permit to install five paint spray booth used for the coating of plastic parts. K001-K003 are used for applying the color paints, K004 is used for applying primer and K005 is used for applying clear coat.

**B. Facility Emissions and Attainment Status**

The facility mixes each coating individually from supplied components. The number of potential mixtures is over 200, consisting of nearly every manufacturer's color of automobile ever produced and the ability to match custom mixes. The coatings are applied in five separate spray booths, see above for further clarification. The facility is applying for a synthetic minor permit to avoid Title V applicability. The facility's potential to emit HAPs exceeds Title V applicability thresholds however, actual emissions are significantly lower. Aside from HAPs, OC material is the pollutant of concern. Cuyahoga County is designated as attainment for ozone.

**C. Source Emissions**

K001 through K005 have a combined potential to emit 122.57 tpy OC material. The potential to emit combined HAPS is 117.6 tpy. Calculations show that the actual facility emissions are 16.64 tpy OC material and combined HAPs are 14.98 tpy with no single HAP greater than 10 tpy. The PTI allowable has been set at 36.5 tpy OC, 9.9 tpy single HAP, and 24.9 tpy combined HAPs based on a rolling, 12-month restriction on OC and HAP material usage for each emissions unit.

**D. Conclusion**

Facility potential to emit exceeds the Title V applicability thresholds; however, actual emissions are significantly lower due to process constraints, inherent physical limitations and production rates. Actual emissions from each source and the facility total are less than the Title V applicability thresholds. This permit will restrict total facility emissions to 36.5 tpy OC, 9.9 tpy for any single HAP and 24.9 tpy for combined HAPs. Therefore, Title V will not apply to this facility. In addition, MACT Subpart PPPP for Plastic Coating operations was signed on 8/29/2003. The first compliance deadline will be three years after the MACT rule is published in the federal register. Consequently, provided this Synthetic Minor permit is issued before the first compliance deadline Dawn Enterprises will not be subject to the MACT Subpart PPPP.



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov.  
Center

**RE: DRAFT PERMIT TO INSTALL  
CUYAHOGA COUNTY  
Application No: 13-04284**

**CERTIFIED MAIL**

**DATE: 4/27/2004**

Dawn Enterprises, Incorporated  
Larry DeLaat  
9155 Sweet Valley Drive  
Valley View, OH 44125

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

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$2000** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

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

CC: USEPA

CLAA

PA

**CUYAHOGA COUNTY**

**PUBLIC NOTICE**

**ISSUANCE OF DRAFT PERMIT TO INSTALL 13-04284 FOR AN AIR CONTAMINANT SOURCE FOR  
DAWN ENTERPRISES, INCORPORATED**

On 4/27/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Dawn Enterprises, Incorporated**, located at **9155 Sweet Valley Drive, Valley View, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 13-04284:

**Three paint spray booths, one priming spray booth, and one clear coat spray booth -- K001 - K005.**

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

David Hearne, Cleveland City Health Department, Division of the Environment, 1925 St. Clair Avenue,  
Cleveland, OH 44114 [(216)664-2324]



**Permit To Install  
Terms and Conditions**

**Issue Date: To be entered upon final issuance  
Effective Date: To be entered upon final issuance**

**DRAFT PERMIT TO INSTALL 13-04284**

Application Number: 13-04284  
APS Premise Number: 1318578397  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Dawn Enterprises, Incorporated  
Person to Contact: Larry DeLaat  
Address: 9155 Sweet Valley Drive  
Valley View, OH 44125

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**9155 Sweet Valley Drive  
Valley View, Ohio**

Description of proposed emissions unit(s):  
**Three paint spray booths, one priming spray booth, and one clear coat spray booth -- K001 - K005.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

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Director

**Part I - GENERAL TERMS AND CONDITIONS**

**A. Permit to Install General Terms and Conditions**

**1. Compliance Requirements**

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

**2. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

**3. Records Retention Requirements**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

**4. Inspections and Information Requests**

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

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

**5. Scheduled Maintenance/Malfunction Reporting**

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

**6. Permit Transfers**

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

**7. Air Pollution Nuisance**

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

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

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

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions

and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

**10. Public Disclosure**

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

**11. Applicability**

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

**12. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

**13. Source Operation and Operating Permit Requirements After Completion of Construction**

- a. If 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 the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule

**Dawn Enterprises, Incorporated**  
**PTI Application: 13-04284**  
**Issued: To be entered upon final issuance**  
3745-77-08(C)(3)(d).

**Facility ID: 1318578397**

Emissions Unit ID: **K001**

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

**14. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**15. Fees**

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

**B. Permit to Install Summary of Allowable Emissions**

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	36.5
Single HAP	9.9
Combination of multiple HAPs	24.9

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

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K001 - Paint spray booth number 1. All plastic after market car parts are coated in this booth with several different pigmented paints.	OAC rule 3745-31-05(A)(3)  OAC rule 3745-21-07(G)(2)  OAC rule 3745-35-07(B)	The requirements of this rule include compliance with OAC rule 3745-21-07(G)(2) and OAC rule 3745-35-07(B).  8.0 lbs OC/hr and 40 lbs OC /day  See A.2.a and A.2.b below

**2. Additional Terms and Conditions**

- a. The emissions of organic compounds (OC) from this emissions unit shall not exceed 7.3 tons per year, based upon a rolling, 12-month summation of the monthly OC material usage rates.
- b. The emissions of hazardous air pollutants (HAP[s]) from emissions units K001 through K005 shall not exceed 9.9 tons per year for any single HAP and 24.9 tons per year for any combination of HAPs, based upon a rolling, 12-month summation of the monthly HAP material usage rates.

**B. Operational Restrictions**

1. The maximum annual OC and HAP material usage shall not exceed 7.3 tpy OC for this emissions unit, 9.9 tpy per single HAP for K001 through K005, and 24.9 tpy combined HAPs for K001 through K005 based upon a rolling, 12- month summation of the OC and HAP material usage figures.

**Dawn**

**PTI A**

Emissions Unit ID: **K001**

**Issued: To be entered upon final issuance**

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

Dawn

PTI A

Emissions Unit ID: **K001**

Issued: To be entered upon final issuance

<u>Month(s)</u>	<u>Maximum Allowable</u> (in tons per year)		
	<u>Cumulative OC</u>	<u>Single HAP</u>	<u>Combined HAPs</u>
	<u>material usage</u>	<u>material usage</u>	<u>material usage</u>
		<u>K001 - K005</u>	<u>K001 - K005</u>
1	3.00	4.00	10.00
1-2	3.39	4.54	11.35
1-3	3.78	5.07	12.70
1-4	4.17	5.61	14.05
1-5	4.56	6.14	15.40
1-6	4.95	6.68	16.75
1-7	5.34	7.21	18.10
1-8	5.73	7.75	19.45
1-9	6.12	8.28	20.80
1-10	6.51	8.82	22.15
1-11	6.90	9.35	23.50
1-12	7.30	9.90	24.90

After the first 12 calendar months of operation after issuance of this permit, compliance with the annual OC and HAP material usage limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

### C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
  - a. the company identification for each coating and photochemically reactive cleanup material employed;
  - b. the amount, in gallons, of each coating and photochemically reactive cleanup material employed;
  - c. the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;
  - d. the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day; [sum of (b x c) for all coatings and cleanup material employed];

- e. the number of hours the emissions unit operated;
- f. the total average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per hour (d/e);
- g. the single HAP content for each coating and clean-up material employed, in pounds per gallon;
- h. the total single HAP emission rate for each HAP [sum of (b x g) for all coatings and cleanup material employed] in, pounds per day;
- i. the combined HAP content for each coating and cleanup material employed, in pounds per gallon;
- j. the combined HAP emission rate [sum of (b x i) for all coatings and cleanup materials employed], in pounds per day.

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

- 2. The permittee shall maintain monthly records of the following information:
  - a. The OC, single HAP, and combined HAP material usage for each month.
  - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the OC, single HAP, and combined HAP material usage figures.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative OC, single HAP, and combined HAP material usage for each calendar month.

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

Dawn

PTI A

Emissions Unit ID: **K001**

**Issued: To be entered upon final issuance**

modeling for the "worst case" pollutant:

n-butyl acetate:

$(8.0 \text{ lbs/hr OC})(46.0\% \text{ n-butyl acetate}) = 3.68 \text{ lbs n-butyl acetate/hour}$

TWA: 150ppm

Molecular Weight: 116.16

$TLV = (150 \text{ ppm})(116.16)/24.45$

$= 712.64 \text{ mg/m}^3$

$MAGLC = (712.64 \text{ mg/m}^3)/42 = 16.97 \text{ mg/m}^3 = 16970 \text{ } \mu\text{g/m}^3$

Maximum Concentration (K001) =  $316.6 \mu\text{g/m}^3 < 16970 \mu\text{g/m}^3$

Ethyl acetate:

$(8.0 \text{ lbs/hr OC})(21.0\% \text{ Ethyl acetate}) = 1.68 \text{ lbs Ethyl acetate/hour}$

TWA: 400 ppm

Molecular Weight: 88.10

$TLV = (400 \text{ ppm})(88.10)/24.45$

$= 1441.31 \text{ mg/m}^3$

$MAGLC = (1441.31 \text{ mg/m}^3)/42 = 34.317 = 34317 \text{ } \mu\text{g/m}^3$

Maximum Concentration (K001) =  $144.5 \mu\text{g/m}^3 < 34317 \mu\text{g/m}^3$

4. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a. changes in the composition of the materials used (inks, coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and,
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. An identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual organic compound emissions for each such hour.
  - b. An identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual average organic compound emissions for each such day.
2. The permittee shall also submit annual reports which specify the total organic compound emissions from this emissions unit for the previous calendar year, and the total single HAP and total combined HAP emissions for K001 through K005 for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitations for OC, single HAP, and combined HAP material usage and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative OC, single HAP, and combined HAP material usage levels.

Dawn

PTI A

Emissions Unit ID: **K001**

**Issued: To be entered upon final issuance**

These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

**E. Testing Requirements**

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

a. Emissions Limitation(s)

8 lbs OC/hr and 40 lbs OC/day

Applicable Compliance Method

Compliance shall be determined from the record keeping and reporting section C.1 and D.1 above, respectively.

b. Emission Limitation

7.30 tons OC per rolling 12-month period

Applicable Compliance Method

Compliance shall be determined from the record keeping and reporting sections C and D above, respectively.

c. Emission Limitation

9.9 tons single HAP per rolling 12-month period (total for K001 - K005)

Applicable Compliance Method

Compliance shall be determined from the record keeping and reporting sections C and D above, respectively.

d. Emission Limitation

24.9 tons combined HAP per rolling 12-month period (total for K001 - K005)

Applicable Compliance Method

**Dawn Enterprises, Incorporated**  
**PTI A**  
**Issued**

**Facility ID: 1318578397**

**Emissions Unit ID: K002**

Compliance shall be determined from the record keeping and reporting sections C and D above, respectively.

**F. Miscellaneous Requirements**

The following terms and conditions are federally enforceable: A., B., C.1. C.2., D., E. and F.

Issued: To be entered upon final issuance

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

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K002 - Paint spray booth number 2. All plastic parts are coated with several different pigmented paints.	OAC rule 3745-31-05(A)(3)  OAC rule 3745-21-07(G)(2)  OAC rule 3745-35-07(B)	The requirements of this rule include compliance with OAC rule 3745-21-07(G)(2) and OAC rule 3745-35-07(B).  8.0 lbs OC/hr and 40 lbs OC /day  See A.2.a and A.2.b below

**2. Additional Terms and Conditions**

- 2.a The emissions of organic compound (OC) from this emissions unit shall not exceed 7.3 tons per year, based upon a rolling, 12-month summation of the monthly OC material usage rates.
- 2.b The emissions of hazardous air pollutants (HAP[s]) from emissions units K001 through K005 shall not exceed 9.9 tons per year for any single HAP and 24.9 tons per year for any combination of HAPs, based upon a rolling, 12-month summation of the monthly HAP material usage rates.

**B. Operational Restrictions**

- 1. The maximum annual OC and HAP material usage shall not exceed 7.3 tpy OC for this emissions unit, 9.9 tpy per single HAP for K001 through K005, and 24.9 tpy combined HAPs for K001 through K005 based upon a rolling, 12- month summation of the OC and HAP material usage

**Dawn**

**PTI A**

Emissions Unit ID: **K002**

**Issued: To be entered upon final issuance**

figures.

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

Dawn

PTI A

Emissions Unit ID: **K002**

Issued: To be entered upon final issuance

<u>Month(s)</u>	<u>Maximum Allowable</u> (in tons per year)			
	<u>Cumulative OC</u>	<u>Single HAP</u>		<u>Combined HAPs</u>
	<u>Material usage</u>	<u>Material usage</u>	<u>Material usage</u>	
		<u>K001 - K005</u>	<u>K001 - K005</u>	<u>K001 - K005</u>
1	3.00	4.00	10.00	
1-2	3.39	4.54	11.35	
1-3	3.78	5.07	12.70	
1-4	4.17	5.61	14.05	
1-5	4.56	6.14	15.40	
1-6	4.95	6.68	16.75	
1-7	5.34	7.21	18.10	
1-8	5.73	7.75	19.45	
1-9	6.12	8.28	20.80	
1-10	6.51	8.82	22.15	
1-11	6.90	9.35	23.50	
1-12	7.30	9.90	24.90	

After the first 12 calendar months of operation after issuance of this permit, compliance with the annual OC and HAP material usage limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

### C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
  - a. the company identification for each coating and photochemically reactive cleanup material employed;
  - b. the amount, in gallons, of each coating and photochemically reactive cleanup material employed;
  - c. the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;
  - d. the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day; [sum of (b x c) for all coatings and cleanup material employed];

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- e. the number of hours the emissions unit operated;
- f. the total average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per hour (d/e);

- g. the single HAP content for each coating and clean-up material employed, in pounds per gallon;
- h. the total single HAP emission rate for each HAP [sum of (b x g) for all coatings and cleanup material employed] in, pounds per day;
- i. the combined HAP content for each coating and cleanup material employed, in pounds per gallon;
- j. the combined HAP emission rate [sum of (b x i) for all coatings and cleanup materials employed], in pounds per day.

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

- 2. The permittee shall maintain monthly records of the following information:
  - a. The OC, single HAP, and combined HAP material usage for each month.
  - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the OC, single HAP, and combined HAP material usage figures.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative OC, single HAP, and combined HAP material usage for each calendar month.

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

n-butyl acetate:  
(8.0 lbs/hr OC)(46.0% n-butyl acetate) = 3.68 lbs n-butyl acetate/hour

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TWA: 150ppm

Molecular Weight: 116.16

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$$\begin{aligned} \text{TLV} &= (150 \text{ ppm})(116.16)/24.45 \\ &= 712.64 \text{ mg/m}^3 \end{aligned}$$

$$\text{MAGLC} = (712.64 \text{ mg/m}^3)/42 = 16.97 \text{ mg/m}^3 = 16970 \text{ } \mu\text{g/m}^3$$

$$\text{Maximum Concentration (K001)} = 316.6 \mu\text{g/m}^3 < 16970 \text{ } \mu\text{g/m}^3$$

Ethyl acetate:

$$(8.0 \text{ lbs/hr OC})(21.0\% \text{ Ethyl acetate}) = 1.68 \text{ lbs Ethyl acetate/hour}$$

TWA: 400 ppm

Molecular Weight: 88.10

$$\text{TLV} = (400 \text{ ppm})(88.10)/24.45$$

$$= 1441.31 \text{ mg/m}^3$$

$$\text{MAGLC} = (1441.31 \text{ mg/m}^3)/42 = 34.317 = 34317 \text{ } \mu\text{g/m}^3$$

$$\text{Maximum Concentration (K001)} = 144.5 \text{ } \mu\text{g/m}^3 < 34317 \text{ } \mu\text{g/m}^3$$

4. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a. changes in the composition of the materials used (inks, coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and,
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

to the change.

5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. An identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual organic compound emissions for each such hour.
  - b. An identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual average organic compound emissions for each such day.
2. The permittee shall also submit annual reports which specify the total organic compound, single HAP, and combined HAP emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitation for OC, single HAP, and combined HAP material usage and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative OC, single HAP, and combined HAP material usage levels. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

#### **E. Testing Requirements**

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

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a. Emissions Limitations

8 lbs OC/hr and 40 lbs OC/day

Applicable Compliance Method

Compliance shall be determined from the record keeping and reporting section C.1 and D.1 above, respectively.

b. Emission Limitation

7.30 tons OC per rolling 12-month period

Applicable Compliance Method

Compliance shall be determined from the record keeping and reporting sections C and D above, respectively.

c. Emission Limitation

9.9 tons single HAP per rolling 12-month period (total for K001 - K005)

Applicable Compliance Method

Compliance shall be determined from the record keeping and reporting sections c and D above, respectively.

d. Emission Limitation

24.9 tons combined HAP per rolling 12-month period (total for K001 - K005)

Applicable Compliance Method

Compliance shall be determined from the record keeping and reporting sections c and D above, respectively.

**F. Miscellaneous Requirements**

The following terms and conditions are federally enforceable: A., B., C.1. C.2., D., E. and F.

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Emissions Unit ID: **K003**

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

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K003 - Paint spray booth number 3. All plastic parts are coated with several different pigmented paints.	OAC rule 3745-31-05(A)(3)  OAC rule 3745-21-07(G)(2)  OAC rule 3745-35-07(B)	The requirements of this rule include compliance with OAC rule 3745-21-07(G)(2) and OAC rule 3745-35-07(B).  8.0 lbs OC/hr and 40 lbs OC /day  See A.2.a and A.2.b below

**2. Additional Terms and Conditions**

- 2.a. The emission of organic compounds(OC) from this emissions unit shall not exceed 7.3 tons per year, based upon a rolling, 12-month summation of the monthly OC material usage rates
- 2.b. The emissions of hazardous air pollutants (HAP[s]) from emission unit K001 through K005 shall not exceed 9.9 tons per year for any single HAP and 24.9 tons per year for any combination of HAPs, based upon a rolling, 12-month summation of the monthly HAP material usage rates.

**B. Operational Restrictions**

1. The maximum annual OC and HAP material usage shall not exceed 7.3 tpy OC for this emissions unit, 9.9 tpy per single HAP for K001 through K005, and 24.9 tpy combined HAPs for K001 through K005 based upon a rolling, 12- month summation of the OC and HAP material usage

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figures.

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

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<u>Month(s)</u>	<u>Maximum Allowable</u> (in tons per year)			
	<u>Cumulative OC</u>	<u>Single HAP</u>		<u>Combined HAPs</u>
	<u>Material usage</u>	<u>Material usage</u>	<u>Material usage</u>	
		<u>K001 - K005</u>	<u>K001 - K005</u>	<u>K001 - K005</u>
1	3.00	4.00	10.00	
1-2	3.39	4.54	11.35	
1-3	3.78	5.07	12.70	
1-4	4.17	5.61	14.05	
1-5	4.56	6.14	15.40	
1-6	4.95	6.68	16.75	
1-7	5.34	7.21	18.10	
1-8	5.73	7.75	19.45	
1-9	6.12	8.28	20.80	
1-10	6.51	8.82	22.15	
1-11	6.90	9.35	23.50	
1-12	7.30	9.90	24.90	

After the first 12 calendar months of operation after issuance of this permit, compliance with the annual OC and HAP material usage limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

### C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
  - a. the company identification for each coating and photochemically reactive cleanup material employed;
  - b. the amount, in gallons, of each coating and photochemically reactive cleanup material employed;
  - c. the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;
  - d. the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day; [sum of (b x c) for all coatings and cleanup material employed];

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- e. the number of hours the emissions unit operated;
- f. the total average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per hour (d/e);

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- g. the single HAP content for each coating and clean-up material employed, in pounds per gallon;
- h. the total single HAP emission rate for each HAP [sum of (b x g) for all coatings and cleanup material employed] in, pounds per day;
- i. the combined HAP content for each coating and cleanup material employed, in pounds per gallon;
- j. the combined HAP emission rate [sum of (b x i) for all coatings and cleanup materials employed], in pounds per day.

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

- 2. The permittee shall maintain monthly records of the following information:
  - a. The OC, single HAP, and combined HAP material usage for each month.
  - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the OC, single HAP, and combined HAP material usage figures.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative OC, single HAP, and combined HAP material usage for each calendar month.

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

n-butyl acetate:

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**Emissions Unit ID: K003**

(8.0 lbs/hr OC)(46.0% n-butyl acetate) = 3.68 lbs n-butyl acetate/hour

TWA: 150ppm

Molecular Weight: 116.16

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$$\begin{aligned} \text{TLV} &= (150 \text{ ppm})(116.16)/24.45 \\ &= 712.64 \text{ mg/m}^3 \end{aligned}$$

$$\text{MAGLC} = (712.64 \text{ mg/m}^3)/42 = 16.97 \text{ mg/m}^3 = 16970 \text{ } \mu\text{g/m}^3$$

$$\text{Maximum Concentration (K001)} = 316.6 \mu\text{g/m}^3 < 16970 \text{ } \mu\text{g/m}^3$$

Ethyl acetate:

$$(8.0 \text{ lbs/hr OC})(21.0\% \text{ Ethyl acetate}) = 1.68 \text{ lbs Ethyl acetate/hour}$$

TWA: 400 ppm

Molecular Weight: 88.10

$$\text{TLV} = (400 \text{ ppm})(88.10)/24.45$$

$$= 1441.31 \text{ mg/m}^3$$

$$\text{MAGLC} = (1441.31 \text{ mg/m}^3)/42 = 34.317 = 34317 \text{ } \mu\text{g/m}^3$$

$$\text{Maximum Concentration (K001)} = 144.5 \text{ } \mu\text{g/m}^3 < 34317 \text{ } \mu\text{g/m}^3$$

4. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- a. changes in the composition of the materials used (inks, coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and,
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

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to the change.

5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. An identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual organic compound emissions for each such hour.
  - b. An identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual average organic compound emissions for each such day.
2. The permittee shall also submit annual reports which specify the total organic compound, single HAP, and combined HAP emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitation for OC, single HAP, and combined HAP material usage and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative OC, single HAP, and combined HAP material usage levels. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

**E. Testing Requirements**

1. Compliance with the emissions limitations in Section A.1 of these terms and conditions shall be

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determined in accordance with the following:

a. Emissions Limitations

8 lbs OC/hr and 40 lbs OC/day

Applicable Compliance Method

Compliance shall be determined from the record keeping and reporting section C.1 and D.1 above, respectively.

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b. Emission Limitation

7.30 tons OC per rolling 12-month period

Applicable Compliance Method

Compliance shall be determined from the record keeping and reporting sections C and D above, respectively.

c. Emission Limitation

9.9 tons single HAP per rolling 12-month period (total for K001 - K005)

Applicable Compliance Method

Compliance shall be determined from the record keeping and reporting sections C and D above, respectively.

d. Emission Limitation

24.9 tons combined HAP per rolling 12-month period (total for K001 - K005)

Applicable Compliance Method

Compliance shall be determined from the record keeping and reporting sections C and D above, respectively.

**F. Miscellaneous Requirements**

The following terms and conditions are federally enforceable: A., B., C.1. C.2., D., E. and F.

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

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K004 - Paint spray booth number 4. All plastic parts are coated with primer.	OAC rule 3745-31-05(A)(3)  OAC rule 3745-21-07(G)(2)  OAC rule 3745-35-07(B)	The requirements of this rule include compliance with OAC rule 3745-21-07(G)(2) and OAC rule 3745-35-07(B).  8.0 lbs OC/hr and 40 lbs OC /day  See A.2.a and A.2.b below

**2. Additional Terms and Conditions**

- 2.a The emission of organic compounds (OC) from this emissions unit shall not exceed 7.3 tons per year, based upon a rolling, 12-month summation of the monthly OC material usage rates.
- 2.b The emissions of hazardous air pollutants (HAP[s]) from emission unit K001 through K005 shall not exceed 9.9 tons per year for any single HAP and 24.9 tons per year for any combination of HAPs, based upon a rolling, 12-month summation of the monthly HAP material usage rates.

**B. Operational Restrictions**

- 1. The maximum annual OC and HAP material usage shall not exceed 7.3 tpy OC for this emissions unit, 9.9 tpy per single HAP for K001 through K005, and 24.9 tpy combined HAPs for K001 through K005 based upon a rolling, 12- month summation of the OC and HAP material usage

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figures.

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

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<u>Month(s)</u>	<u>Maximum Allowable</u> (in tons per year)			
	<u>Cumulative OC</u>	<u>Single HAP</u>		<u>Combined HAPs</u>
	<u>Material usage</u>	<u>Material usage</u>	<u>Material usage</u>	
		<u>K001 - K005</u>	<u>K001- K005</u>	
1	3.00	4.00	10.00	
1-2	3.39	4.54	11.35	
1-3	3.78	5.07	12.70	
1-4	4.17	5.61	14.05	
1-5	4.56	6.14	15.40	
1-6	4.95	6.68	16.75	
1-7	5.34	7.21	18.10	
1-8	5.73	7.75	19.45	
1-9	6.12	8.28	20.80	
1-10	6.51	8.82	22.15	
1-11	6.90	9.35	23.50	
1-12	7.30	9.90	24.90	

After the first 12 calendar months of operation after issuance of this permit, compliance with the annual OC and HAP material usage limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

### C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
  - a. the company identification for each coating and photochemically reactive cleanup material employed;
  - b. the amount, in gallons, of each coating and photochemically reactive cleanup material employed;
  - c. the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;
  - d. the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day; [sum of (b x c) for all coatings and cleanup material employed];

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- e. the number of hours the emissions unit operated;
- f. the total average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per hour (d/e);

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- g. the single HAP content for each coating and clean-up material employed, in pounds per gallon;
- h. the total single HAP emission rate for each HAP [sum of (b x g) for all coatings and cleanup material employed] in, pounds per day;
- i. the combined HAP content for each coating and cleanup material employed, in pounds per gallon;
- j. the combined HAP emission rate [sum of (b x i) for all coatings and cleanup materials employed], in pounds per day.

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

- 2. The permittee shall maintain monthly records of the following information:
  - a. The OC, single HAP, and combined HAP material usage for each month.
  - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the OC, single HAP, and combined HAP material usage figures.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative OC, single HAP, and combined HAP material usage for each calendar month.

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

n-butyl acetate:

$(8.0 \text{ lbs/hr OC})(18.34\% \text{ n-butyl acetate}) = 1.467 \text{ lbs n-butyl acetate/hour}$   
TWA: 150ppm  
Molecular Weight: 116.16  
 $TLV = (150 \text{ ppm})(116.16)/24.45$   
 $= 712.64 \text{ mg/m}^3$   
 $MAGLC = (712.64 \text{ mg/m}^3)/42 = 16.97 \text{ mg/m}^3 = 16970 \text{ } \mu\text{g/m}^3$   
Maximum concentration =  $50.18 \text{ } \mu\text{g/m}^3 < 16970 \text{ } \mu\text{g/m}^3$

4. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a. changes in the composition of the materials used (inks, coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and,
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
  - a. a description of the parameters changed (composition of materials, new pollutants emitted,

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change in stack/exhaust parameters, etc.);

- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and,
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. An identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual organic compound emissions for each such hour.
  - b. An identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual average organic compound emissions for each such day.
2. The permittee shall also submit annual reports which specify the total organic compound, single HAP, and combined HAP emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitation for OC, single HAP, and combined HAP material usage and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative OC, single HAP, and combined HAP material usage levels. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

**E. Testing Requirements**

1. Compliance with the emissions limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following:
  - a. Emissions Limitations  
  
8 lbs OC/hr and 40 lbs OC/day

Applicable Compliance Method

Compliance shall be determined from the record keeping and reporting sections C.1 and D.1 above, respectively.

b. Emission Limitation

7.30 tons OC per rolling 12-month period

Applicable Compliance Method

Compliance shall be determined from the record keeping and reporting sections C and D above, respectively.

c. Emission Limitation

9.9 tons single HAP per rolling 12-month period (total for K001 - K005)

Applicable Compliance Method

Compliance shall be determined from the record keeping and reporting sections C and D above, respectively.

d. Emission Limitation

24.9 tons combined HAP per rolling 12-month period (total for K001 - K005)

Applicable Compliance Method

Compliance shall be determined from the record keeping and reporting sections C and D above, respectively.

**F. Miscellaneous Requirements**

The following terms and conditions are federally enforceable: A., B., C.1. C.2., D., E. and F.

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

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K005 - Paint spray booth number 5. All plastic parts are coated with clear coat.	OAC rule 3745-31-05(A)(3)  OAC rule 3745-21-07(G)(2)  OAC rule 3745-35-07(B)	The requirements of this rule include compliance with OAC rule 3745-21-07(G)(2) and OAC rule 3745-35-07(B).  8.0 lbs OC/hr and 40 lbs OC /day  See A.2.a and A.2.b below

**2. Additional Terms and Conditions**

- 2.a** The emission of organic compounds (OC) from this emissions unit shall not exceed 7.3 tons per year, based upon a rolling, 12-month summation of the monthly OC material usage rates.
- 2.b** The emission of hazardous air pollutants (HAP[s]) from emission unit K001 through K005 shall not exceed 9.9 tons per year for any single HAP and 24.9 tons per year for any combination of HAPs, based upon a rolling, 12-month summation of the monthly HAP material usage rates.

**B. Operational Restrictions**

1. The maximum annual OC and HAP material usage shall not exceed 7.3 tpy OC for this emissions unit, 9.9 tpy per single HAP for K001 through K005, and 24.9 tpy combined HAPs for K001 through K005 based upon a rolling, 12- month summation of the OC and HAP material usage figures.

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

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<u>Month(s)</u>	<u>Maximum Allowable</u> (in tons per year)			
	<u>Cumulative OC</u>	<u>Single HAP</u>		<u>Combined HAPs</u>
	<u>Material usage</u>	<u>Material usage</u>	<u>Material usage</u>	
		<u>K001 - K005</u>	<u>K001 - K005</u>	<u>K001 - K005</u>
1	3.00	4.00	10.00	
1-2	3.39	4.54	11.35	
1-3	3.78	5.07	12.70	
1-4	4.17	5.61	14.05	
1-5	4.56	6.14	15.40	
1-6	4.95	6.68	16.75	
1-7	5.34	7.21	18.10	
1-8	5.73	7.75	19.45	
1-9	6.12	8.28	20.80	
1-10	6.51	8.82	22.15	
1-11	6.90	9.35	23.50	
1-12	7.30	9.90	24.90	

After the first 12 calendar months of operation after issuance of this permit, compliance with the annual OC and HAP material usage limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

### C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
  - a. the company identification for each coating and photochemically reactive cleanup material employed;
  - b. the amount, in gallons, of each coating and photochemically reactive cleanup material employed;
  - c. the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;
  - d. the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day; [sum of (b x c) for all coatings and cleanup material

- employed];
- e. the number of hours the emissions unit operated;
  - f. the total average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per hour (d/e);
  - g. the single HAP content for each coating and clean-up material employed, in pounds per gallon;
  - h. the total single HAP emission rate for each HAP [sum of (b x g) for all coatings and cleanup material employed] in, pounds per day;
  - i. the combined HAP content for each coating and cleanup material employed, in pounds per gallon;
  - j. the combined HAP emission rate [sum of (b x i) for all coatings and cleanup materials employed], in pounds per day.

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

2. The permittee shall maintain monthly records of the following information:
  - a. The OC, single HAP, and combined HAP material usage for each month.
  - b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the OC, single HAP, and combined HAP material usage figures.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative OC, single HAP, and combined HAP material usage for each calendar month.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. An identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8

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pounds per hour, and the actual organic compound emissions for each such hour.

- b. An identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual average organic compound emissions for each such day.
2. The permittee shall also submit annual reports which specify the total organic compound, single HAP, and combined HAP emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitation for OC, single HAP, and combined HAP material usage and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative OC, single HAP, and combined HAP material usage levels. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

#### **E. Testing Requirements**

1. Compliance with the emissions limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following:
  - a. Emissions Limitations  
  
8 lbs OC/hr and 40 lbs OC/day  
  
Applicable Compliance Method  
  
Compliance shall be determined from the record keeping and reporting sections C.1 and D.1 above, respectively.
  - b. Emission Limitation  
  
7.30 tons OC per rolling 12-month period  
  
Applicable Compliance Method  
  
Compliance shall be determined from the record keeping and reporting sections C and D above, respectively.

c. Emission Limitation

9.9 tons single HAP per rolling 12-month period (total for K001 - K005)

Applicable Compliance Method

Compliance shall be determined from the record keeping and reporting sections C and D above, respectively.

d. Emission Limitation

24.9 tons combined HAP per rolling 12-month period (total for K001 - K005)

Applicable Compliance Method

Compliance shall be determined from the record keeping and reporting sections C and D above, respectively.

**F. Miscellaneous Requirements**

The following terms and conditions are federally enforceable: A., B., C.1. C.2., D., E. and F.