



8/15/2014

Certified Mail

Ken Miller  
JCIM, LLC  
918 South Union Street  
Bryan, OH 43506

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 0386010201  
Permit Number: P0117245  
Permit Type: Renewal  
County: Williams

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. 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 PTIO 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, Northwest District Office at (419)352-8461 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: Ohio EPA-NWDO



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
JCIM, LLC**

Facility ID:	0386010201
Permit Number:	P0117245
Permit Type:	Renewal
Issued:	8/15/2014
Effective:	8/15/2014
Expiration:	8/15/2019





**Division of Air Pollution Control  
Permit-to-Install and Operate**

for  
JCIM, LLC

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**Final Permit-to-Install and Operate**  
JCIM, LLC  
**Permit Number:** P0117245  
**Facility ID:** 0386010201  
**Effective Date:** 8/15/2014

## Authorization

Facility ID: 0386010201  
Application Number(s): A0051019, A0051020, A0051505, A0051507  
Permit Number: P0117245  
Permit Description: Renewal FEPTIO for a plastic injection molding and coating operations facility.  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 8/15/2014  
Effective Date: 8/15/2014  
Expiration Date: 8/15/2019  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

JCIM, LLC  
918 South Union St  
Bryan, OH 43506-0568

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

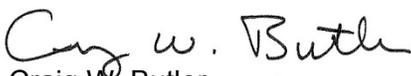
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office  
347 North Dunbridge Road  
Bowling Green, OH 43402  
(419)352-8461

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Craig W. Butler  
Director



## Authorization (continued)

Permit Number: P0117245  
 Permit Description: Renewal FEPTIO for a plastic injection molding and coating operations facility.

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

**Emissions Unit ID: P002**  
 Company Equipment ID: Assembly  
 Superseded Permit Number: P0087835  
 General Permit Category and Type: Not Applicable

**Emissions Unit ID: P801**  
 Company Equipment ID: P801  
 Superseded Permit Number: P0087835  
 General Permit Category and Type: Not Applicable

**Emissions Unit ID: R029**  
 Company Equipment ID: Paint booth #29  
 Superseded Permit Number: P0087835  
 General Permit Category and Type: Not Applicable

**Group Name: Painting Operations**

<b>Emissions Unit ID:</b>	<b>R006</b>
Company Equipment ID:	Paint booth #6
Superseded Permit Number:	P0087835
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>R012</b>
Company Equipment ID:	Paint booth #12
Superseded Permit Number:	P0087835
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>R013</b>
Company Equipment ID:	Paint booth #13
Superseded Permit Number:	P0087835
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>R014</b>
Company Equipment ID:	Paint booth #14
Superseded Permit Number:	P0087835
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>R015</b>
Company Equipment ID:	Paint booth #15
Superseded Permit Number:	P0087835
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install and Operate**  
JCIM, LLC  
**Permit Number:** P0117245  
**Facility ID:** 0386010201  
**Effective Date:** 8/15/2014

## **A. Standard Terms and Conditions**



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

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

**2. Who is responsible for complying with this permit?**

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

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

**3. What records must I keep under this permit?**

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

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

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

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

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

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

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

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



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

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

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

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

**7. What reports must I submit under this permit?**

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

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

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

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

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

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



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

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

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

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

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

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

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

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

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

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



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

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

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

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

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

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



**Final Permit-to-Install and Operate**  
JCIM, LLC  
**Permit Number:** P0117245  
**Facility ID:** 0386010201  
**Effective Date:** 8/15/2014

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



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.
2. All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.



**Final Permit-to-Install and Operate**  
JCIM, LLC  
**Permit Number:** P0117245  
**Facility ID:** 0386010201  
**Effective Date:** 8/15/2014

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



1. P002, Assembly

Operations, Property and/or Equipment Description:

gluing station

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. None.
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(1)a., b)(2)a., c)(1), d)(1), d)(2), e)(1) and f)(1)
- 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(D)	9.00 tons per rolling, 12-month period for any individual HAP and 24.00 tons per rolling, 12-month period for any combination of HAPs for emissions units P002, P801, R006, R012 through R015, and R029, combined [See b)(2)a.i.]  80 tons Volatile Organic Compounds (VOC)/rolling, 12-month period, from emissions units P002, P801, R006, R012 through R015, and R029, combined [See b)(2)a.ii. and c)(1)]
b.	OAC rule 3745-17-11(C)	See c)(2) and c)(3)



(2) Additional Terms and Conditions

a. The permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:

i. 9.00 tons per rolling, 12-month period for any individual HAP and 24.00 tons per rolling, 12-month period for any combination of HAPs for emissions units P002, P801, R006, R012 through R015, and R029, combined.

Federally enforceable limitations of 9.0 tons of any individual HAP and 24.0 tons of any combination of HAP's per rolling, 12-month period were initially established in a permit issued on April 12, 2007 and as such the facility has existing records of HAP emissions in lieu of establishing monthly HAP emissions restrictions for the first year of operation.

80 tons VOCs/rolling, 12-month period, from emissions units P002, P801, R006, R012 through R015, and R029, combined [See c)(1)].

c) Operational Restrictions

(1) The maximum rolling, 12-month quantity of VOC-containing materials employed in emissions units P002, P801, R006, R012 through R015, and R029, combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^n V_i G_i \div 2000 \frac{lbs}{ton} \leq 80.0 tons$$

where,

M = the increment of the rolling 12-month period;

V<sub>i</sub> = VOC content in pounds per gallon of each material employed

G<sub>i</sub> = Gallons used of each VOC containing material for the rolling 12-month period

n = total number of unique VOC containing materials employed in emissions units P002, P801, R006, R012 through R015, and R029.

Federally enforceable limitations of 80 tons VOC/per rolling, 12-month period were initially established in a permit issued on June 30, 2009 and as such the facility has existing records of VOC emissions in lieu of establishing monthly VOC emissions restrictions for the first year of operation.

(2) The permittee shall operate and maintain the dry particulate filter system for the surface coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The dry particulate filter shall be employed during all periods of coating application to control particulate emissions.



- (3) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

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

- (1) The permittee shall collect and record the following information each month for all materials containing any hazardous air pollutant (HAP) that are applied in emissions units P002, P801, R006, R012 through R015, and R029, combined:
  - a. the name and identification number/code of each HAP-containing material;
  - b. the name/identification of each individual HAP contained in each material applied [and identified in d)(1)a. above] and the pound(s) of each HAP per gallon of each HAP-containing material applied;
  - c. the number of gallons of each HAP-containing material applied during the month;
  - d. for each individual HAP, the total emissions from all the materials employed, in ton(s), i.e., for each individual HAP, the summation of the products of d)(1)b. times d)(1)c. for all the materials applied during the month, divided by 2,000 pounds;
  - e. the total combined HAPs emissions from all the materials employed during the month, in ton(s), i.e., the summation of all the individual HAPs emissions from d)(1)d. above;
  - f. for each individual HAP, the total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in d)(1)d. above, for the present month plus the previous 11 months of operation, in ton(s); and
  - g. the total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in d)(1)e. above, for the present month plus the previous 11 months of operation, in ton(s).

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

- (2) The permittee shall collect and record the following information each month for all materials containing any VOCs that are applied in emissions units P002, P801, R006, R012 through R015, and R029, combined:
  - a. the company name or identification for each VOC-containing material employed;
  - b. the volume, in gallons, of each VOC-containing material employed;



- c. the VOC content of each VOC containing material employed, in pounds per gallon, as applied;
  - d. the VOC emission rate, in pounds, for each VOC-containing material employed [d)(2)b. times d)(2)c.];
  - e. the total VOC emission rate from all VOC-containing materials employed [summation of d)(2)d.], in pounds or tons; and
  - f. the rolling, 12-month VOC emission rates, in tons.
- (3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (4) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (5) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (6) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
- a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (7) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.



e) Reporting Requirements

(1) 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. 9.00 tons per rolling, 12-month period for any individual HAP for emissions units P002, P801, R006, R012 through R015, and R029, combined;
  - ii. 24.00 tons per rolling, 12-month period for any combination of HAPs for emissions units P002, P801, R006, R012 through R015, and R029, combined; and
  - iii. 80 tons VOC/rolling, 12-month period from emissions units P002, P801, R006, R012 through R015, and R029, combined,
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the director (the appropriate district office or local air agency).

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

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

- a. Emission Limitation:  
9.00 tons per rolling, 12-month period for any individual HAP and 24.00 tons per rolling, 12-month period for any combination of HAPs for emissions units P002, P801, R006, R012 through R015, and R029, combined.



Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Term d)(1) of this permit.

b. Emission Limitation:

80 tons VOC/rolling, 12-month period from emissions units P002, P801, R006, R012 through R015, and R029, combined.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in Term d)(2) of this permit.

g) Miscellaneous Requirements

(1) None.



2. P801, P801

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

Facility wide cleanup

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

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

a. None.

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

a. b)(1)a., b)(2)a., c)(1), d)(1), d)(2), e)(1), and f)(1)

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(D)	9.00 tons per rolling, 12-month period for any individual HAP and 24.00 tons per rolling, 12-month period for any combination of HAPs for emissions units P002, P801, R006, R012 through R015, and R029, combined [See b)(2)a.i.]  80 tons Volatile Organic Compounds (VOC)/rolling, 12-month period, from emissions units P002, P801, R006, R012 through R015, and R029, combined [See b)(2)a.ii. and c)(1)]

(2) Additional Terms and Conditions

a. The permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:



- i. 9.00 tons per rolling, 12-month period for any individual HAP and 24.00 tons per rolling, 12-month period for any combination of HAPs for emissions units P002, P801, R006, R012 through R015, and R029, combined.

Federally enforceable limitations of 9.0 tons of any individual HAP and 24.0 tons of any combination of HAP's per rolling, 12-month period were initially established in a permit issued on April 12, 2007 and as such the facility has existing records of HAP emissions in lieu of establishing monthly HAP emissions restrictions for the first year of operation.

- ii. 80 tons VOCs/rolling, 12-month period, from emissions units P002, P801, R006, R012 through R015, and R029, combined [See c)(1)].

c) Operational Restrictions

- (1) The maximum rolling, 12-month quantity of VOC-containing materials employed in emissions units P002, P801, R006, R012 through R015, and R029, combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^n V_i G_i \div 2000 \frac{lbs}{ton} \leq 80.0 tons$$

where,

M = the increment of the rolling 12-month period;

V<sub>i</sub> = VOC content in pounds per gallon of each material employed

G<sub>i</sub> = Gallons used of each VOC containing material for the rolling 12-month period

n = total number of unique VOC containing materials employed in emissions units P002, P801, R006, R012 through R015, and R029.

Federally enforceable limitations of 80 tons VOC/per rolling, 12-month period were initially established in a permit issued on June 30, 2009 and as such the facility has existing records of VOC emissions in lieu of establishing monthly VOC emissions restrictions for the first year of operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for all materials containing any hazardous air pollutant (HAP) that are applied in emissions units P002, P801, R006, R012 through R015, and R029, combined:

- a. the name and identification number/code of each HAP-containing material;
- b. the name/identification of each individual HAP contained in each material applied [and identified in d)(1)a. above] and the pound(s) of each HAP per gallon of each HAP-containing material applied;
- c. the number of gallons of each HAP-containing material applied during the month;



- d. for each individual HAP, the total emissions from all the materials employed, in ton(s), i.e., for each individual HAP, the summation of the products of d)(1)b. times d)(1)c. for all the materials applied during the month, divided by 2,000 pounds;
- e. the total combined HAPs emissions from all the materials employed during the month, in ton(s), i.e., the summation of all the individual HAPs emissions from d)(1)d. above;
- f. for each individual HAP, the total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in d)(1)d. above, for the present month plus the previous 11 months of operation, in ton(s); and
- g. the total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in d)(1)e. above, for the present month plus the previous 11 months of operation, in ton(s).

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

- (2) The permittee shall collect and record the following information each month for all materials containing any VOCs that are applied in emissions units P002, P801, R006, R012 through R015, and R029, combined:
  - a. the company name or identification for each VOC-containing material employed;
  - b. the volume, in gallons, of each VOC-containing material employed;
  - c. the VOC content of each VOC containing material employed, in pounds per gallon, as applied;
  - d. the VOC emission rate, in pounds, for each VOC-containing material employed [d)(2)b. times d)(2)c.];
  - e. the total VOC emission rate from all VOC-containing materials employed [summation of d)(2)d.], in pounds or tons; and
  - f. the rolling, 12-month VOC emission rates, in tons.
- (3) If a credit for recovered materials is used to demonstrate compliance and/or used in the calculation of rolling, 12 month emission calculations, the permittee shall maintain the following records for the recovered materials, and the recovery drum or tank serving this emissions unit:
  - a. the date recovered materials were first added to the recovery tank/drum and the date the materials from the recovery drum or tank were shipped off site;



- b. the total amount of material collected and shipped for recycle/recovery and/or disposal at an outside facility, in gallons, on the day it is shipped;
- c. a record of the VOC content of each material that is collected for recovery, in pounds per gallon, or a record of the testing results of the VOC content of the material shipped;
- d. the mass (lbs) of VOC to be credited to the rolling, 12-month emissions summation, from each shipment of recovered material, calculated using the lowest VOC content of any material recovered, unless a higher VOC content is established from the testing results of the recovered material shipped [i.e., d)(3)b. times d)(3)c.], and the date of each such shipment or record of credit; and
- e. the record of the total amount of VOC emissions (lbs or tons) that may be applied as a credit, for the materials shipped for recycle/recovery and/or disposal at an outside facility, summed from the records of the VOC emission credits [d)(3)d.], for each shipment recorded during the rolling 12 month period.
- f. the rolling 12-month summation of VOC emissions from the materials employed, after any credit claimed for solvent recycling.

e) Reporting Requirements

(1) 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. 9.00 tons per rolling, 12-month period for any individual HAP for emissions units P002, P801, R006, R012 through R015, and R029, combined;
  - ii. 24.00 tons per rolling, 12-month period for any combination of HAPs for emissions units P002, P801, R006, R012 through R015, and R029, combined; and
  - iii. 80 tons VOC/rolling, 12-month period from emissions units P002, P801, R006, R012 through R015, and R029, combined,
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

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



The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the director (the appropriate district office or local air agency).

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

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

a. Emission Limitations:

9.00 tons per rolling, 12-month period for any individual HAP and 24.00 tons per rolling, 12-month period for any combination of HAPs for emissions units P002, P801, R006, R012 through R015, and R029 , combined.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Term d)(1) of this permit.

b. Emission Limitation:

80 tons VOC/rolling, 12-month period from emissions units P002, P801, R006, R012 through R015, and R029 , combined.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in Terms d)(2) and d)(3) of this permit.

g) Miscellaneous Requirements

- (1) None.



**3. R029, Paint booth #29**

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

paint spray booth 29 -plastic molded products (with drying oven)

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. b)(1)f., d)(4), d)(5), and d)(6)
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(1)b., b)(2)c., c)(1), d)(2), d)(3), e)(1), f)(1)e. and f)(1)f.
- 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)(a)	46.6 lbs organic compounds (OC)/hr& 48.8 tons OC/yr  0.61 lb particulate emissions (PE)/ hr& 2.67 tons PE/yr  See b)(2)a.
b.	OAC rule 3745-31-05(D)	9.00 tons per rolling, 12-month period for any individual HAP and 24.00 tons per rolling, 12-month period for any combination of HAPs for emissions units P002, P801, R006, R012 through R015, and R029 , combined [See b)(2)b.i.]  80 tons Volatile Organic Compound (VOC)/rolling, 12-month period from emissions units P002, P801, R006, R012 through R015, and R029, combined [See b)(2)b.ii. and c)(1)]



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-11(B)	See b)(2)c.
d.	OAC rule 3745-17-07A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20% percent opacity as a six-minute average, except as provided by rule.
e.	OAC rule 3745-17-11(C)	See b)(2)d.
f.	OAC rule 3745-114-01	See d)(4), d)(5), and d)(6)

(2) Additional Terms and Conditions

- a. The "Best Available Technology" (BAT) requirements for this emissions unit have been determined to be the use of a dry filtration system and compliance with the requirements of 3745-21-07(G)(2) and OAC rule 3745-17-07(A).
- b. The permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:
  - i. 9.00 tons per rolling, 12-month period for any individual HAP and 24.00 tons per rolling, 12-month period for any combination of HAPs for emissions units P002, P801, R006, R012 through R015, and R029, combined.  
  
 Federally enforceable limitations of 9.0 tons of any individual HAP and 24.0 tons of any combination of HAP's per rolling, 12-month period were initially established in a permit issued on April 12, 2007 and as such the facility has existing records of HAP emissions in lieu of establishing monthly HAP emissions restrictions for the first year of operation.
  - ii. 80 tons VOCs/rolling, 12-month period, from emissions units P002, P801, R006, R012 through R015, and R029, combined [See c)(1)].
- c. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3)(a).
- d. This emissions unit is not subject to the requirements specified in OAC rule 3745-17-11(C), pursuant to OAC rule 3745-17-11(C)(3), because the emissions unit was issued a permit-to-install after January 1, 1990 that identifies particulate emission limitations and control measures based on best available technology.

c) Operational Restrictions

- (1) The maximum rolling, 12-month quantity of VOC-containing materials employed in emissions units P002, P801, R006, R012 through R015, and R029, combined, is limited by the following equation:



$$\sum_{M=1}^{12} \sum_{i=1}^n V_i G_i \div 2000 \frac{lbs}{ton} \leq 80.0 tons$$

where,

- M = the increment of the rolling 12-month period;
- $V_i$  = VOC content in pounds per gallon of each material employed
- $G_i$  = Gallons used of each VOC containing material for the rolling 12-month period
- n = total number of unique VOC containing materials employed in emissions units P002, P801, R006, R012 through R015, and R029.

Federally enforceable limitations of 80 tons VOC/per rolling, 12-month period were established in a permit issued on June 30, 2009 and as such the facility has existing records of VOC emissions in lieu of establishing monthly VOC emissions restrictions for the first year of operation.

- (2) The permittee shall operate the dry filtration system on the paint spray booth whenever the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for the purpose of determining annual organic compound emissions:
  - a. the company identification for each coating employed;
  - b. the number of gallons of each coating employed;
  - c. the organic compound content of each coating, in pounds per gallon;
  - d. the organic compound emission rate for each coating material employed [d)(1)b. times d)(1)c.], in pounds;
  - e. the total organic compound emission rate for all coatings [summation of d)(1)d.], in pounds; and
  - f. the annual, year-to-date organic compound emissions for all coatings, in pounds.
- (2) The permittee shall collect and record the following information each month for all materials containing any hazardous air pollutant (HAP) that are applied in emissions units P002, P801, R006, R012 through R015, and R029, combined:
  - a. the name and identification number/code of each HAP-containing material;
  - b. the name/identification of each individual HAP contained in each material applied [and identified in d)(2)a. above] and the pound(s) of each HAP per gallon of each HAP-containing material applied;
  - c. the number of gallons of each HAP-containing material applied during the month;



- d. for each individual HAP, the total emissions from all the materials employed, in ton(s), i.e., for each individual HAP, the summation of the products of d)(2)b. times d)(2)c. for all the materials applied during the month, divided by 2,000 pounds;
- e. the total combined HAPs emissions from all the materials employed during the month, in ton(s), i.e., the summation of all the individual HAPs emissions from d)(2)d. above;
- f. for each individual HAP, the total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in d)(2)d. above, for the present month plus the previous 11 months of operation, in ton(s); and
- g. the total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in d)(2)e. above, for the present month plus the previous 11 months of operation, in ton(s).

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

- (3) The permittee shall collect and record the following information each month for all materials containing any VOCs that are applied in emissions units P002, P801, R006, R012 through R015, and R029, combined:
  - a. the company name or identification for each VOC-containing material employed;
  - b. the volume, in gallons, of each VOC-containing material employed;
  - c. the VOC content of each VOC containing material employed, in pounds per gallon, as applied;
  - d. the VOC emission rate, in pounds, for each VOC-containing material employed [d)(3)b. times d)(3)c.];
  - e. the total VOC emission rate from all VOC-containing materials employed [summation of d)(3)d.], in pounds or tons; and
  - f. the rolling, 12-month VOC emission rates, in tons.
- (4) The permit to install for this emissions unit R029 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-



Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: methyl amyl ketone

TLV (ug/m3): 233,000

Maximum Hourly Emission Rate (lbs/hr): 47.6 (includes clean-up)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4186

MAGLC (ug/m3): 5550

- (5) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- (6) 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);



- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
- (7) The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
- e) Reporting Requirements
- (1) 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. 9.00 tons per rolling, 12-month period for any individual HAP for emissions units P002, P801, R006, R012 through R015, and R029, combined;
    - ii. 24.00 tons per rolling, 12-month period for any combination of HAPs for emissions units P002, P801, R006, R012 through R015, and R029, combined; and
    - iii. 80 tons VOC/rolling, 12-month period from emissions units P002, P801, R006, R012 through R015, and R029, combined,
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).
- If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.
- The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the director (the appropriate district office or local air agency).
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- f) Testing Requirements



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

a. Emission Limitation:  
46.4 lbs OC/hr

Applicable Compliance Method:

The hourly OC emission limitation is based on the emissions unit's potential to emit.\* Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

\*The potential to emit for this emissions unit was based on a maximum emission rate of 3.6 lbs OC per gallon combined with an hourly usage rate of 12.9 gallons per hour.

b. Emission Limitation:  
48.8 tons OC/yr

Applicable Compliance Method:

The annual OC emission limitation represents the potential to emit of the emissions unit and is based on inherent limitations associated with product molding throughput capacities. Compliance shall be verified based on the record keeping requirements as specified in Term d)(1) of this permit.

c. Emission Limitation:  
0.61 lb PE /hr

Applicable Compliance Method:

The permittee may calculate actual PE rate from the unit utilizing the following equation:

$$E = (\text{maximum coating solids usage rate}) \times (1-TE) \times (1-CE)$$

where:

E = PE rate (pounds/hour).

TE = Transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used.

CE = Control efficiency of the control equipment (filters).

If required, compliance with the hourly PE limitation shall be determined in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

d. Emission Limitation:  
2.67 ton PE /yr

Applicable Compliance Method:



The annual allowable PE limitation was developed by multiplying the hourly limitation by 8760, and then dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall be also be demonstrated.

e. Emission Limitations:

9.00 tons per rolling, 12-month period for any individual HAP and 24.00 tons per rolling, 12-month period for any combination of HAPs for emissions units P002, P801, R006, R012 through R015, and R029, combined.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Term d)(2) of this permit.

f. Emission Limitation:

80 tons VOCs/rolling, 12-month period, from emissions units P002, P801, R006, R012 through R015, and R029, combined.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in Term d)(3) of this permit.

g. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be demonstrated in accordance with OAC rule 3745-17-03(B)(1).

g) Miscellaneous Requirements

(1) None.



**4. Emissions Unit Group -Painting Operations: R006,R012,R013,R014,R015,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
R006	paint booth 6 (spray booth w/filters).
R012	paint booth 12 (spray booth w/filters)
R013	paint booth 13 (spray booth w/filters)
R014	paint booth 14 (spray booth w/filters).
R015	paint booth 15 (spray booth w/filters)

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

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

a. None.

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

a. b)(1)a., b)(2)a., c)(1), d)(1), d)(2), e)(1) and f)(1)

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(D)	9.00 tons per rolling, 12-month period for any individual HAP and 24.00 tons per rolling, 12-month period for any combination of HAPs for emissions units P002, P801, R006, R012 through R015, and R029, combined [See b)(2)a.i.]  80 tons Volatile Organic Compounds (VOC)/rolling, 12-month period, from emissions units P002, P801, R006, R012 through R015, and R029, combined [See b)(2)a.ii. and c)(1)]
b.	OAC rule 3745-17-11(C)	See c)(2) and c)(3)



(2) Additional Terms and Conditions

a. The permit establishes the following federally enforceable emission limitations for purposes of avoiding applicability of Title V and Maximum Achievable Control Technology (MACT) regulations:

i. 9.00 tons per rolling, 12-month period for any individual HAP and 24.00 tons per rolling, 12-month period for any combination of HAPs for emissions units P002, P801, R006, R012 through R015, and R029, combined.

Federally enforceable limitations of 9.0 tons of any individual HAP and 24.0 tons of any combination of HAP's per rolling, 12-month period were initially established in a permit issued on April 12, 2007 and as such the facility has existing records of HAP emissions in lieu of establishing monthly HAP emissions restrictions for the first year of operation.

ii. 80 tons VOCs/rolling, 12-month period, from emissions units P002, P801, R006, R012 through R015, and R029, combined [See c)(1)].

c) Operational Restrictions

(1) The maximum rolling, 12-month quantity of VOC-containing materials employed in emissions units P002, P801, R006, R012 through R015, and R029, combined, is limited by the following equation:

$$\sum_{M=1}^{12} \sum_{i=1}^n V_i G_i \div 2000 \frac{lbs}{ton} \leq 80.0 tons$$

where,

M = the increment of the rolling 12-month period;

V<sub>i</sub> = VOC content in pounds per gallon of each material employed

G<sub>i</sub> = Gallons used of each VOC containing material for the rolling 12-month period

n = total number of unique VOC containing materials employed in emissions units P002, P801, R006, R012 through R015, and R029.

Federally enforceable limitations of 80 tons VOC/per rolling, 12-month period were initially established in a permit issued on June 30, 2009 and as such the facility has existing records of VOC emissions in lieu of establishing monthly VOC emissions restrictions for the first year of operation.

(2) The permittee shall operate and maintain the dry particulate filter system for the surface coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The dry particulate filter shall be employed during all periods of coating application to control particulate emissions.

(3) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications



deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for all materials containing any hazardous air pollutant (HAP) that are applied in emissions units P002, P801, R006, R012 through R015, and R029, combined:

- a. the name and identification number/code of each HAP-containing material;
- b. the name/identification of each individual HAP contained in each material applied [and identified in d)(1)a. above] and the pound(s) of each HAP per gallon of each HAP-containing material applied;
- c. the number of gallons of each HAP-containing material applied during the month;
- d. for each individual HAP, the total emissions from all the materials employed, in ton(s), i.e., for each individual HAP, the summation of the products of d)(1)b. times d)(1)c. for all the materials applied during the month, divided by 2,000 pounds;
- e. the total combined HAPs emissions from all the materials employed during the month, in ton(s), i.e., the summation of all the individual HAPs emissions from d)(1)d. above;
- f. for each individual HAP, the total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in d)(1)d. above, for the present month plus the previous 11 months of operation, in ton(s); and
- g. the total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in d)(1)e. above, for the present month plus the previous 11 months of operation, in ton(s).

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

(2) The permittee shall collect and record the following information each month for all materials containing any VOCs that are applied in emissions units P002, P801, R006, R012 through R015, and R029, combined:

- a. the company name or identification for each VOC-containing material employed;
- b. the volume, in gallons, of each VOC-containing material employed;
- c. the VOC content of each VOC containing material employed, in pounds per gallon, as applied;



- d. the VOC emission rate, in pounds, for each VOC-containing material employed [d)(2)b. times d)(2)c.];
  - e. the total VOC emission rate from all VOC-containing materials employed [summation of d)(2)d.], in pounds or tons; and
  - f. the rolling, 12-month VOC emission rates, in tons.
- (3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (4) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (5) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (6) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
- a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.
- These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (7) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- e) Reporting Requirements
- (1) 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. 9.00 tons per rolling, 12-month period for any individual HAP for emissions units P002, P801, R006, R012 through R015, and R029, combined;
  - ii. 24.00 tons per rolling, 12-month period for any combination of HAPs for emissions units P002, P801, R006, R012 through R015, and R029, combined; and
  - iii. 80 tons VOC/rolling, 12-month period from emissions units P002, P801, R006, R012 through R015, and R029, combined,
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the director (the appropriate district office or local air agency).

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

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

- a. Emission Limitation:  
9.00 tons per rolling, 12-month period for any individual HAP and 24.00 tons per rolling, 12-month period for any combination of HAPs for emissions units P002, P801, R006, R012 through R015, and R029, combined.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Term d)(1) of this permit.



- b. Emission Limitation:  
80 tons VOC/rolling, 12-month period from emissions units P002, P801, R006, R012 through R015, and R029, combined.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in Term d)(2) of this permit.

- g) Miscellaneous Requirements

- (1) None.