



8/20/2014

Vinod Shah
 Continental Structural Plastics of Ohio LLC aka CSP OH
 255 Rex Blvd.
 Auburn Hills, MI 48326

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
 Facility ID: 0204020245
 Permit Number: P0117485
 Permit Type: Administrative Modification
 County: Ashtabula

Certified Mail

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

Dear Permit Holder:

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

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

How to appeal this permit

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

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

How to save money, reduce pollution and reduce energy consumption

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

How to give us feedback on your permitting experience

Please complete a survey at 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 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, Northeast District Office at (330)425-9171 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA
Ohio EPA-NEDO; Pennsylvania; Canada



FINAL

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

for

Continental Structural Plastics of Ohio LLC aka CSP OH

Facility ID:	0204020245
Permit Number:	P0117485
Permit Type:	Administrative Modification
Issued:	8/20/2014
Effective:	8/20/2014



Division of Air Pollution Control
Permit-to-Install
for
Continental Structural Plastics of Ohio LLC aka CSP OH

Table of Contents

Authorization	1
A. Standard Terms and Conditions	3
1. Federally Enforceable Standard Terms and Conditions	4
2. Severability Clause	4
3. General Requirements	4
4. Monitoring and Related Record Keeping and Reporting Requirements.....	5
5. Scheduled Maintenance/Malfunction Reporting	6
6. Compliance Requirements	6
7. Best Available Technology	7
8. Air Pollution Nuisance	8
9. Reporting Requirements	8
10. Applicability	8
11. Construction of New Sources(s) and Authorization to Install	8
12. Permit-To-Operate Application	9
13. Construction Compliance Certification	10
14. Public Disclosure	10
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations	10
16. Fees.....	10
17. Permit Transfers	10
18. Risk Management Plans	10
19. Title IV Provisions	10
B. Facility-Wide Terms and Conditions.....	11
C. Emissions Unit Terms and Conditions	13
1. K001, Paint Line 1.....	14



Authorization

Facility ID: 0204020245
Facility Description: Reinforced plastic composite parts manufacturing and painting
Application Number(s): M0002956
Permit Number: P0117485
Permit Description: Administrative modification to K001 to change annual PE limit to correct a mathematical error.
Permit Type: Administrative Modification
Permit Fee: \$100.00
Issue Date: 8/20/2014
Effective Date: 8/20/2014

This document constitutes issuance to:

Continental Structural Plastics of Ohio LLC aka CSP OH
333 Gore Road
Conneaut, OH 44030

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

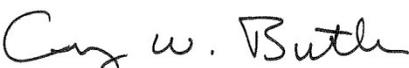
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)425-9171

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Craig W. Butler
Director



Final Permit-to-Install
Continental Structural Plastics of Ohio LLC aka CSP OH
Permit Number: P0117485
Facility ID: 0204020245
Effective Date:8/20/2014

Authorization (continued)

Permit Number: P0117485

Permit Description: Administrative modification to K001 to change annual PE limit to correct a mathematical error.

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

Emissions Unit ID:	K001
Company Equipment ID:	Paint Line 1
Superseded Permit Number:	02-19379
General Permit Category and Type:	Not Applicable



Final Permit-to-Install
Continental Structural Plastics of Ohio LLC aka CSP OH
Permit Number: P0117485
Facility ID: 0204020245
Effective Date: 8/20/2014

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e)General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.



- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northeast District Office.



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

5. Scheduled Maintenance/Malfunction Reporting

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

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

- a) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the appropriate Ohio EPA District Office or contracted



local air agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Ohio EPA DAPC, Northeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

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



8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

10. Applicability

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

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

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



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

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

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

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

12. Permit-To-Operate Application

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



13. Construction Compliance Certification

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

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

14. Public Disclosure

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

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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. Fees

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

17. Permit Transfers

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

18. Risk Management Plans

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

19. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.



B. Facility-Wide Terms and Conditions



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.
2. Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
3. The following emissions units, as well as all storage containers and mixing vessels in which coating, thinners and/or other additives, and cleaning materials are stored or mixed, all manual and automated equipment and containers used for conveying coatings, thinners, other additives, purge, and cleaning materials, and all storage container and all manual and automated equipment and containers used for conveying waste materials generated by the coating operations contained in this permit are subject to 40 CFR Part 63, Subpart PPPP, National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products. The complete Maximum Achievable Control Technology (MACT) requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Ohio EPA Northeast District Office.

EU ID	Operations, Property and/or Equipment Description
K001	Paint line 1 - coating line for plastic parts.
P042	Misc. assembly - adhesive bonding.
P044	Paint kitchen - paint stirring in closed drums.



C. Emissions Unit Terms and Conditions



1. K001, Paint Line 1

Operations, Property and/or Equipment Description:

2.5 mmBTU/hr. natural gas-fired water dry off oven, two plastic parts coating spray booths, and a 2.5 mmBTU/hr. natural gas-fired coating dry off oven.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05 (A)(3), PTI 02-19379, issued on December 28, 2004, for emissions unit K001	<p>There shall be no visible particulate emissions (PE) from the stack(s) serving the water dry off oven and the coating dry off oven during any 30-minute observation period.</p> <p>PE shall not exceed 0.0057 lb/hr from each dry off oven.</p> <p>Carbon monoxide (CO) emissions shall not exceed 0.206 lb/hr from each dry off oven.</p> <p>CO emissions shall not exceed 1.81 tons/yr from the dry off ovens, combined.</p> <p>Nitrogen oxides (NO_x) emissions shall not exceed 0.25 lb/hr from each dry off oven.</p> <p>NO_x emissions shall not exceed 2.19 tons/yr from the dry off ovens, combined.</p> <p>Organic compound (OC) emissions shall not exceed 0.027 lb/hr from the natural gas fuel combustion at each dry off oven. See c)(1).</p> <p>Visible PE from the stack serving the coating operation shall not exceed 0% opacity as a 6-minute average.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>PE shall not exceed 0.21 lb/hr from the stack serving the coating operation.</p> <p>OC emissions shall not exceed 621 lbs/day from the coating operation.</p> <p>OC emissions shall not exceed 1741 lbs/month from the cleanup/purge operation.</p> <p>The requirements of this rule include compliance with the requirements of OAC rule 3745-31-05(D)(1)(a) and 40 CFR Part 63, Subpart PPPP.</p> <p>See c)(2), c)(3), d)(2) and e)(1)a.</p> <p>PE shall not exceed 0.97 ton/yr from all operations.</p> <p>OC emissions shall not exceed 30.0 tons/yr from all operations.</p>
b.	OAC rule 3745-31-05(D)(1)(a) – voluntary restriction to limit volatile organic compound (VOC) and to avoid the Lowest Achievable Emissions Rate (LAER) Offset requirements.	The VOC emissions shall not exceed 29.7 tons, based upon a rolling, 12-month summation of the emissions from the coating and cleanup/purge operations, combined.
c.	OAC rule 3745-17-11(C)	The requirements specified by this rule are less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	40 CFR Part 63, Subpart PPPP [40 CFR 63.4480 – 63.4581]	<p>In accordance with 40 CFR 63.4490(a)(1) through (4), organic hazardous air pollutant (HAP) emissions shall be limited to no more than the limit specified; e.g. 0.16 pound organic HAP emitted per pound coating solids used during each 12-month compliance period for each general use coating operation.</p> <p>See b)(2)a and b)(2)b.</p>
e.	40 CFR 63.1 - 63.15	The General Provisions that apply are specified in Table 2 of 40 CFR Part 63, Subpart PPPP.



(2) Additional Terms and Conditions

a. The permittee must include all coatings (as defined in 40 CFR 63.4581), thinners and/or other additives, and cleaning materials used in this emissions unit when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in b)(1)d. To make this determination, the permittee must use at least one of the following compliance operations. The permittee may apply any of the compliance options to an individual coating operation, or to multiple coating operations as a group, or to the entire affected source. The permittee may use different compliance options for different coating operations or at different times on the same coating operation. The permittee may employ different compliance options when different coatings are applied to the same part, or when the same coating is applied to different parts. However, the permittee may not use different compliance options at the same time on the same coating operations. If the permittee switches between compliance options for any coating operation or group of coating operations, the permittee must document this switch as required by 40 CFR 63.4530(c), the permittee must report it in the next semiannual compliance report required in 40 CFR 63.4520.

i. Compliant material option:

Demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable emission limit in section b)(1)d., and that each thinner and/or other additive, and cleaning material used contains no organic HAP. The permittee must meet all the requirements of 40 CFR 63.4540, 63.4541 and 63.4542 to demonstrate compliance with the applicable emission limit using this option.

or

ii. Emission rate without add-on controls options.

Demonstrate that, based on the coatings, thinners and/or, other additives, and cleaning materials used in the coating operation(s), the organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emissions limit in b)(1)d, calculated as a rolling, 12-month emission rate and determined on a monthly basis. The permittee must meet all the requirements of 40 CFR 63.4550, 63.4551 and 63.4552 to demonstrate compliance with the emission limit using this option.

[Authority for term: OAC rule 3745-77-07(A)(1), 40 CFR 63.4491(a) - (b) and PTI 02-19379]

b. The permittee must be in compliance with the emission limitations in b)(1)d at all times.

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR 63.4500(a)(1)]



c) Operational Restrictions

- (1) The permittee shall burn only natural gas in the water dry off oven and in the coating dry off oven.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-19379]

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

[Authority for term: OAC rule 3745-17-11(C)(1), OAC rule 3745-77-07(C)(1) and PTI 02-19379]

- (3) The use of cleanup/purge materials, containing HAP, is prohibited.

[Authority for term: PTI 02-197379, 40 CFR 63.4491(a) – compliant material option, OAC rule 3745-77-07(C)(1)]

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in the water dry off oven and in the coating dry off oven.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 02-19379]

- (2) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was 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.

[Authority for term: OAC rule 3745-17-11(C)(1) and PTI 02-19379]

- (3) The permittee shall collect and record the following information for each day for this emissions unit:

- a. the company identification for each coating material employed;
- b. an identification of the coating operations classification (e.g. general use operation, automotive lamp operation, thermoplastic olefin (TPO) operation or assembled on-road vehicle operation) for each coating material employed;
- c. the volume of each coating material employed, in gallons per day;
- d. the total OC content and the VOC content of each coating, in pounds per gallon;
- e. the organic HAP content of each coating, in lb of HAP per lb of solids; and



- f. the total OC emission rate for all coatings materials, in pounds per day, calculated as specified:

$$E_p = \sum_{i=1}^n [(VP)(OC)]_i$$

where:

E_p = total OC emissions from all coating materials, in pounds per day;

VP = volume of each coating material, in gallons, as recorded in d)(3)c;

OC = OC content of each coating material, in pounds per gallon, as recorded in d)(3)d;

i = subscript denoting an individual coating material;

n = the total number of different coating materials; and

- g. the total VOC emissions rate for all coating materials, in pounds per day, which may be calculated as specified in d)(3)f., except that the VOC content is employed instead of the OC content. Equivalent, alternative method(s), as approved by Ohio EPA may be employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall collect and record the following information for each month for this emissions unit:

- a. the company identification of each cleanup material employed;
- b. the volume of each cleanup material employed, in gallons;
- c. the total OC content, the VOC content and the organic HAP content of each cleanup material, in pounds per gallon;
- d. the volume of each waste cleanup material collected for reuse or disposal in gallons;
- e. the volume of each evaporated cleanup material, which is calculated by subtracting the volume of waste cleanup material employed from the volume of cleanup material reused or disposed of, as “b” – “d”, in gallons;
- f. the OC emissions from cleanup materials in pounds per month, calculated as specified:

$$E_c = \sum_{j=1}^m [(VC)(OCc)]_j$$

where:

E_c = monthly OC emissions from cleanup materials, in pounds per month;



VC = volume of each evaporated cleanup material, in gallons, as recorded in d)(5)e;

OCc = OC content of each cleanup material, in pounds per gallon, as recorded in d)(4)c;

j = subscript denoting an individual cleanup material;

m = the total number of different cleanup materials; and

- g. the total VOC emissions rate for all cleanup/purge materials, in pounds per month, which may be calculated as specified in d)(4)f, except that the VOC content is employed instead of the OC content. Equivalent, alternative method(s), as approved by Ohio EPA may be employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall collect and record the following information for each month for this emissions unit:

- a. the VOC emissions from the coatings operation and the cleanup/purge operation, combined, for each month, in tons, calculated as specified:

$$VOC(\text{Month}) = \{ \sum_{i=1}^n [EP]i + EC \} \times \text{ton OC}/2000 \text{ lbs. OC.}$$

where:

EP = the VOC emissions from all coating materials, in pounds per day, as recorded in d)(3)g;

i = subscript denoting individual daily emissions from coating materials;

n = the total number of days of coating materials usage;

EC = the VOC emissions from cleanup/purge materials, in pounds per month, as recorded in d)(4)g; and

- b. the rolling, 12-month summation of the VOC emissions from the coatings operation and the cleanup/purge operation, combined, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1)]

- (6) The permittee shall collect and record each month for this emissions unit the information required under 40 CFR Part 63, Subpart PPPP, including sections 63.4530 and 63.4531.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.4530 and 63.4531]

e) Reporting Requirements

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



- a. an identification of each day when a fuel other than natural gas was burned in the water dry off oven or in the coating dry off oven;
- b. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation;
- c. an identification of each day during which the daily OC emissions from the coatings operation exceeded 621 lbs/day, and the actual daily OC emissions for each such day;
- d. an identification of each month during which the monthly OC emissions from the use of cleanup/purge materials exceeded 1741 lbs/month, and the actual monthly OC emissions for each such month;
- e. an identification of each month during which the rolling, 12-month VOC emissions from the coatings operation and the cleanup/purge operation, combined, exceeded 29.7 tons, and the actual rolling, 12-month VOC emissions for each such month; and
- f. an identification of each day during which any cleanup/purge materials with a HAP content were employed.

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

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C) and OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart PPPP, including sections 63.4510 and 63.4520.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR 63.4510 and 63.4520]

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:

There shall be no visible PE from the stack(s) serving the water dry off oven and the coating dry off oven during any 30-minute observation period.

Applicable Compliance Method:

Compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 22.



b. Emission Limitation:

Visible PE from the stack serving the coating operation shall not exceed 0% opacity as a 6-minute average.

Applicable Compliance Method:

Compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

c. Emission Limitations:

PE shall not exceed 0.0057 lb/hr from each dry off oven.

CO emissions shall not exceed 0.206 lb/hr from each dry off oven.

NO_x emissions shall not exceed 0.25 lb/hr from each dry off oven.

OC emissions shall not exceed 0.027 lb/hr from the natural gas fuel combustion at each dry off oven.

Applicable Compliance Method:

To determine the worst case emission rate the following equation may be used:

$$E_i_D01 = E_i_O1 = \text{mmBtu/hr} \times EF_i$$

where:

$E_i_D01 = E_i_O1$ = the emissions rate from the water dry off oven or the coating dry off oven, in pounds per hour;

mmBtu/hr = the maximum rated heat input capacity, which is 2.5 million Btu per hour for each natural gas fired dry off oven, as noted in the permit application; and

EF_i = the emissions factor for pollutant i, which is as follows, assuming an average natural gas fuel heat value of 1,020 Btu per standard cubic foot:

0.0019 lb PE/mmBtu, derived from AP-42, Table 1.4-2, chapter 1.4 (7/98);

0.0824 lb CO/mmBtu, derived from AP-42, Table 1.4-1, chapter 1.4 (7/98);

0.098 lb NO_x/mmBtu, derived from AP-42, Table 1.4-1, chapter 1.4 (7/98); and

0.0108 lb OC/mmBtu, derived from AP-42, Table 1.4-2, chapter 1.4 (7/98).

If required pursuant to OAC rule 3745-15-04(A), the permittee shall demonstrate compliance with these emission limitations through emissions tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and Methods



5, 10, 7E and 25, for the PE rate, CO, NO_x and OC emissions, respectively. Equivalent, alternative method(s), as approved by Ohio EPA, may be performed.

d. Emission Limitations:

CO emissions shall not exceed 1.81 tons/yr from the dry off ovens, combined.

NO_x emissions shall not exceed 2.19 tons/yr from the dry off ovens, combined.

Applicable Compliance Method:

Compliance may be based on the determination of the maximum, controlled, annual emissions by the following equation:

$$E_i(\text{YR}) = E_i(\text{HR}) \times \text{Hrs/yr} \times \text{ton } E_i / 2000 \text{ lbs } E_i$$

where:

$E_i(\text{YR})$ = the maximum, annual emissions rate, in tons/yr, for pollutant "i", in tons/yr;

$E_i(\text{HR}) = E_{i_D01} = E_{i_O1}$ = maximum, hourly controlled pollutant emissions, in lbs/hr, as specified in f)(1)c; and

Hrs/yr = the maximum annual operating hours, which is 8,760 hrs/yr.

e. Emission Limitation:

PE shall not exceed 0.21 lb/hr from the stack serving the coating operation.

Applicable Compliance Method:

To determine the actual emission rate the following equation may be used:

$$E_PE = V_i \times D_i \times \text{Solids Ratio}_i \times EF_PE \times (1 - CP) \times (1 - CE)$$

where:

E_PE = PE rate from the coating operation, in pounds per hour;

V_i = the volume of coating "i" employed, in gallons per day;

D_i = density of coating "i" employed, in lbs. per gallon;

Solids Ratio_i = solids content of coating "i", in pound of available solids per pound of coating;

EF_PE = emission factor for uncontrolled PE, which is 0.50 pounds of uncontrolled PE per pound of available solids, i.e. a 50% transfer efficiency for air atomized high volume low pressure spray guns as noted in Chapter 10, Air Pollution Engineering Manual, 1992;



CP = capture efficiency of the coating booth, which is 1.0 lb PE captured per lb uncontrolled PE as noted in the permit application; and

CE = control efficiency of the PE control device, a paper filter, which is 0.99 lb PE controlled/lb uncontrolled PE as noted in the permit application.

If required, pursuant to OAC rule 3745-15-04(A), the permittee shall demonstrate compliance with these emission limitations through emissions tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and Methods 5 for the PE rate. Equivalent, alternative method(s), as approved by Ohio EPA, may be performed.

f. Emission Limitation:

OC emissions shall not exceed 621 lbs/day from the coating operation.

Applicable Compliance Method:

Compliance may be demonstrated based upon the record keeping requirements specified in d)(3)f.

g. Emission Limitation:

OC emissions shall not exceed 1741 lbs/month from the cleanup/purge operation.

Applicable Compliance Method:

Compliance may be demonstrated based upon the record keeping requirements specified in d)(4)f.

h. Emission Limitation:

The VOC emissions shall not exceed 29.7 tons, based upon a rolling, 12-month summation of the emissions from the coating and cleanup/purge operations, combined.

Applicable Compliance Method:

Compliance may be demonstrated based upon the record keeping requirements specified in d)(5)b.

i. Emission Limitation:

In accordance with 40 CFR 63.4490(a)(1) through (4), organic hazardous air pollutant (HAP) emissions shall be limited to no more than the limit specified; e.g. 0.16 pound organic HAP emitted per pound coating solids used during each 12-month compliance period for each general use coating operation.



Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(3)e and d)(6).

j. Emission Limitation:

PE shall not exceed 0.97 ton/yr from all operations.

Applicable Compliance Method:

To determine the worst case emission rates the following equation may be used:

$$E_{PE_TOTAL} = E_{PE_OVENS}(YR) + (E_{PE_COATING} \times 8760 \text{ hrs/yr} \times \text{ton PE}/2000 \text{ lbs PE})$$

where:

E_{PE_TOTAL} = the PE rate from the dry off ovens and the coatings operation, in tons/yr;

$E_{PE_OVENS}(YR)$ = the PE rate from the dry off ovens, in tons/yr, as specified in f)(1)d; and

$E_{PE_COATING}$ = the PE rate from the coatings operation, in lbs/hr, as specified in f)(1)e.

k. Emission Limitation:

OC emissions shall not exceed 30.0 tons/yr from all operations.

Applicable Compliance Method:

To determine the actual emission rates the following equation may be used:

$$E_{OC_TOTAL} = E_{OC_OVENS}(YR) + [(\sum_{i=1}^n EPi) + (\sum_{j=1}^m ECj) \times \text{ton OC}/2000 \text{ lbs OC}]$$

where:

E_{OC_TOTAL} = the OC rate from the dry off ovens, the coatings operation and the cleanup/purge operation, in tons/yr;

$E_{OC_OVENS}(YR)$ = the OC rate from the dry off ovens, in tons/yr, as specified in f)(1)d;

EP = the OC emissions from all coating materials, in pounds per day, as specified in d)(3)f;

i = subscript denoting an individual day's emissions from the coatings operation;

n = the total number of days of coatings operation;



EC = the monthly OC emissions from cleanup/purge materials, in pounds per month;

j = subscript denoting an individual month's emissions from the cleanup/purge operation; and

m = the total number of months of cleanup/purge operation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.