

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

Permit To Install **14-05064**

A. Emissions Units Description

This Permit to Install (PTI 14-05123) is for several emissions units at Pease Industries. Pease Industries manufactures metal, wood and fiberglass doors. This permit involves the installation of three new emissions units and the modification of several other ones. This permit will limit the HAP emissions from emissions unit K004, K006 and K007 so that OAC rule 3745-31-28 and 112g do not apply.

B. Facility Emissions and Attainment Status

Pease Industries employs coatings and adhesives in the production of the doors which emit HAPs. The permittee requests to incorporate federally enforceable limitations in this PTI which will limit HAP emissions from emissions units K004, K006 and K007 to less than 10 TPY as a rolling, 12-month summation of any single HAP and less than 25 TPY as a rolling, 12-month summation for combined HAPs. Butler County is attainment for all criteria pollutants.

C. Source Emissions

Potential emissions were calculated based on maximum capacity and 8760 hrs/yr of operation. The potential HAP emissions from these emissions unit in the absence of a federally enforceable PTI would be 192.3 TPY of a single HAP and 192.3 TPY of combined HAPs. The emission limitations outlined in this PTI limit facility-wide HAPs emissions to less than 10 TPY as a rolling, 12-month summation for any single HAP and less than 25 TPY as a rolling, 12-month summation for combined HAPs for emissions units K004, K006 and K007. The facility will keep records and submit reports as described in the PTI to ensure compliance with the emission limits.

D. Conclusion

The terms and conditions in this PTI will limit HAP emissions from emissions units K004, K006 and K007 to less than 10 TPY as a rolling, 12-month summation of any single HAP and less than 25 TPY as a rolling, 12-month summation for combined HAPs. The permittee will maintain records and submit reports as outlined in the additional terms and conditions for all emissions units to demonstrate compliance.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
BUTLER COUNTY**

CERTIFIED MAIL

Street Address:

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

Mailing Address:
Lazarus Gov.
Center

Application No: 14-05064

DATE: 8/28/2001

Pease Industries Incorporated
Matt Goesling
7100 Dixie Highway
Fairfield, OH 45014

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

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$2400** will be due. Please do not submit any payment now.

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

Very truly yours,

Thomas G. Rigo
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

HCDES

KY

IN

Ohio-Kentucky-Indiana Reg Coun of Gov



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 14-05064

Application Number: 14-05064
APS Premise Number: 1409030092
Permit Fee: **To be entered upon final issuance**
Name of Facility: Pease Industries Incorporated
Person to Contact: Matt Goesling
Address: 7100 Dixie Highway
Fairfield, OH 45014

Location of proposed air contaminant source(s) [emissions unit(s)]:

**7100 Dixie Highway
Fairfield, Ohio**

Description of proposed emissions unit(s):

This permit to install will cover the following emissions units; (3) doorlines w/ reverse rollcoaters, (1) side light line, (1) glass department, (2) Ransburg paintlines and, (1) finishing department.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Pease Industries Incorporated

Facility ID: 1409030092

PTI Application: 14-05064

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping 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:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. 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:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. 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 appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.10 below if no deviations occurred during the quarter.

Pease Industries Incorporated

PTI Application: 14-05064

Issued: To be entered upon final issuance

Facility ID: 1409030092

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., 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.
- iv. 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.

2. 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 appropriate Ohio EPA District Office or local air agency 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).

3. 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.

4. 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.

5. Severability Clause

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.

Pease Industries Incorporated

PTI Application: 14-05064

Issued: To be entered upon final issuance

Facility ID: 1409030092

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. 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 reissuance, or modification, or for denial of a permit renewal application.
- 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, reopened, 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, reopening 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.

7. Fees

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

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that 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, the State, and citizens under the Act. All other terms and conditions of this permit

Pease Industries Incorporated

Facility ID: 1409030092

PTI Application: 14-05064

Issued: To be entered upon final issuance

shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. 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:
 - i. 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.
 - ii. 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.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. 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 appropriate Ohio EPA District Office or local air agency 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:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. 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.

10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete

Pease Industries Incorporated

Facility ID: 1409030092

PTI Application: 14-05064

Issued: To be entered upon final issuance

Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35 , the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

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

Pease Industries Incorporated

Facility ID: 1409030092

PTI Application: 14-05064

Issued: To be entered upon final issuance

B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping 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 appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from 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 appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Permit Transfers

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

4. 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.

5. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may

Pease Industries Incorporated

Facility ID: 1409030092

PTI Application: 14-05064

Issued: To be entered upon final issuance

be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

6. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

7. 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.

8. 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).

Pease Industries Incorporated

Facility ID: 1409030092

PTI Application: 14-05064

Issued: To be entered upon final issuance

9. Construction Compliance Certification

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

10. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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

C. Permit To Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	88.0
PM-PM10	11.0
Individual HAPs	9.9
Combined HAPs	24.9

12

Pease Industries Incorporated

PTI Application: 14-05064

Issued: To be entered upon final issuance

Facility ID: 1409030092

Pease

PTI A

Emissions Unit ID: K001

Issued: To be entered upon final issuance

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None.

Pease

PTI A

Emissions Unit ID: K001

Issued: To be entered upon final issuance**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property,
and/or Equipment

Applicable Rules/Requirements

OAC rule 3745-21-09 (U)(1)(c)

K001 - Doorline #1 with Reverse Rollcoater

OAC rule 3745-31-05 (A)(3)

OAC rule 3745-21-07 (G)

OAC rule 3745-17-07 (A)(1)

OAC rule 3745-17-11

Pease Industries Incorporated
PTI Application: 14-05064
Issued

Facility ID: 1409030092

Emissions Unit ID: K001

Applicable Emissions
Limitations/Control
Measures

2.6 lbs OC/ hour (non-metal
parts)
39.2 lbs OC/hour (metal
parts)
20.0 tons/year OC*

0.38 lb PM-PM10/ hour
1.7 tons/year PM-PM10

See Terms A.I.2.e. and
A.II.1.

The requirements of this rule
also include compliance with
the requirements of OAC
rule 3745-17-07(A)(1) and
OAC rule 3745-21-09
(U)(1)(c).

* Based upon a rolling,
12-month summation.
Combined emissions for
emissions units K001, K003,
K004 and K006.

See Term A.I.2.a.

The emission limitation
specified by this rule is less
stringent than the emission
limitation established
pursuant to OAC rule
3745-31-05(A)(3).

See term A.I.2.b.

Exempt

2. Additional Terms and Conditions

Issued: To be entered upon final issuance

- 2.a** The visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- 2.b** The OC content as applied of each of the coatings employed in emissions unit K001 shall not exceed 3.5 pounds per gallon for metal parts, excluding water and exempt solvents.
- 2.c** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the usage and emissions limits and the use of compliance coatings.
- 2.d** The hourly emission limitations outlined in Term A.I.1. are based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.e** The use of photochemically reactive material as defined in OAC rule 3745-21-01 (C)(5) is prohibited (for non-metal parts).

II. Operational Restrictions

1. The permittee shall not employ more than 20.0 tons of OC per year in emissions units K001, K003, K004 and K006, combined based upon a rolling, 12-month summation of the OC input figures.

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

Month(s)	Maximum Allowable Cumulative Input Rates of OC (tons)
1	1.7
1-2	3.4
1-3	5.1
1-4	6.8
1-5	8.5
1-6	10.2
1-7	11.9
1-8	13.6
1-9	15.3
1-10	17.0
1-11	18.7

Issued: To be entered upon final issuance

1-12	20.0
------	------

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual OC input limitation shall be based upon a rolling, 12-month summation of the OC input figures.

The OC input figures are equivalent to the OC emission rates and are based upon 100% of the solvent in the coating materials being emitted.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions unit K001 :
 - a. The name and identification number of each coating, as applied and the type of material it is used to coat (metal or non-metal);
 - b. The number of gallons of each coating employed;
 - c. The OC content of each coating, in pounds per gallon, as applied;
 - d. The OC content of each coating, in pounds per gallon (excluding water and exempt solvents), as applied;
 - e. The total OC emissions (input) from all coatings, in pounds (b x c); and,
 - f. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the OC emission (input) figures for emissions unit K001, K003, K004 and K006, combined.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative OC emissions (input) for each calendar month.

Note: The permittee may track the coating usage based on the number of doors produced and use a coating usage factor (gallons of coating used per door produced) to calculate the gallons of coating used from the number of doors manufactured. The permittee shall update the factor every six calendar months using actual inventory records if such a factor is used. The calculations used to develop the coating usage factor shall maintained on file.

2. The permittee shall collect and record the following information each month:

- a. The company identification of each liquid organic material employed in this emissions unit; and,
- b. A record of each liquid organic material employed in this emissions unit indicating, whether or not the liquid organic material is photochemically reactive as identified in OAC rule 3745-21-01(C)(5).

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month OC input limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative OC input levels.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month OC emission limitation.
3. The permittee shall submit an annual report for emissions unit K001 which lists the total OC emissions for the calendar year. This report shall be submitted by January 31 of each year and shall cover the previous calendar year.
4. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings in emissions unit K001 (for metal parts). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
5. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit (for non-metal parts). This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of material(s) emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.
6. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

1. The permittee shall calculate the OC emission rate for each emissions unit by multiplying the OC content by the coating usage rate unless otherwise stated in this permit.
2. Compliance with the emissions and usage limits cited in Term A.I.1 shall be demonstrated by the record keeping in Term A.III.1.
3. Compliance with the rolling, 12-month summation limits cited in Term A.II.1 shall be

Emissions Unit ID: K001

demonstrated by the record keeping in Term A.III.1.

4. USEPA Methods 24 and 24A shall be used to determine the OC contents for the coatings and cleanup materials employed in this emissions unit. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
5. Compliance with the visible particulate limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

VI. Miscellaneous Requirements

None.

Issued: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K001 - Doorline #1 with Reverse Rollcoater	None	See term B.VI.1

2. Additional Terms and Conditions

None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

None.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified

Pease Industries Incorporated**PTI Application: 14-05064****Issued****Facility ID: 1409030092**

Emissions Unit ID: K001

permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
K002 - Ransburg Paintline 1	OAC rule 3745-31-05 (A)(3)	OAC rule 3745-21-07 (G)
	OAC rule 3745-17-07 (A)	
	OAC rule 3745-17-11	
	OAC rule 3745-21-09 (U)(1)(i)	

Pease

PTI A

Emissions Unit ID: K002

Issued: To be entered upon final issuance

Applicable Emissions Limitations/Control Measures	Exempt
276.0 lbs OC/day 40.0 tons/year OC*	
0.23 lb PM-PM10/hour 1.0 ton/year PM-PM10	
See terms A.I.2.e. and A.II.1	
The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).	
* Based upon a rolling, 12-month summation. Combined emissions for emissions units K002 and K007.	
See Term A.I.2.a.	
The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).	
The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).	

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

- 2.a** The visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- 2.b** The OC content as applied of each of the coatings employed in emissions unit K002 shall not exceed 0.6 pounds per gallon.
- 2.c** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the usage and emissions limits, use of compliance coatings and compliance with the Ohio EPA Air Toxics policy.
- 2.d** The hourly emission limitation outlined in Term A.I.1. is based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.e** The use of photochemically reactive material as defined in OAC rule 3745-21-01 (C)(5) is prohibited (for non-metal parts).

II. Operational Restrictions

- 1. The permittee shall not employ more than 40.0 tons of OC per year in emissions units K002 and K007 combined based upon a rolling, 12-month summation of the OC input figures.

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

Month(s)	Maximum Allowable Cumulative Input Rates of OC (tons)
1	3.3
1-2	6.6
1-3	9.9
1-4	13.2
1-5	16.5
1-6	19.8
1-7	23.1
1-8	26.4
1-9	29.7
1-10	33.0
1-11	36.3

Issued: To be entered upon final issuance

1-12	40.0
------	------

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual OC input limitation shall be based upon a rolling, 12-month summation of the OC input figures.

The OC input figures are equivalent to the OC emission rates and are based upon 100% of the solvent in the coating materials being emitted.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions unit K002 :
 - a. The name and identification number of each coating, as applied and the type of material it is used to coat (metal or non-metal);
 - b. The number of gallons of each coating employed;
 - c. The OC content of each coating, in pounds per gallon, as applied;
 - d. The OC content of each coating, in pounds per gallon (excluding water and exempt solvents), as applied;
 - e. The total OC emissions (input) from all coatings, in pounds (b x c); and,
 - f. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the OC emissions (input) figures for emissions units K002 and K007 combined.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative OC emissions input for each calendar month.

Note: The permittee may track the coating usage based on the number of doors produced and use a coating usage factor (gallons of coating used per door produced) to calculate the gallons of coating used from the number of doors manufactured. The permittee shall update the factor every six calendar months using actual inventory records if such a factor is used. The calculations used to develop the coating usage factor shall be maintained on file.

2. The permittee shall collect and record the following information each month:

- a. The company identification of each liquid organic material employed in this emissions unit; and,
- b. A record of each liquid organic material employed in this emissions unit indicating, whether or not the liquid organic material is photochemically reactive as identified in OAC rule 3745-21-01(C)(5).

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month OC input limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative OC input levels.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month OC emission limitation.
3. The permittee shall submit an annual report for emissions unit K002 which lists the total OC emissions for the calendar year. This report shall be submitted by January 31 of each year and shall cover the previous calendar year.
4. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings in emissions unit K002. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
5. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit (for non-metal parts). This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of material(s) emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.
6. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

1. The permittee shall calculate the OC emission rate for each emissions unit by multiplying the OC content by the coating usage rate unless otherwise stated in this permit.
2. Compliance with the emissions limits cited in Term A.I.1 shall be demonstrated by the record keeping in Term A.III.1.
3. Compliance with the rolling, 12-month summation usage limits cited in Term A.II.1 shall be

Issued: To be entered upon final issuance

demonstrated by the record keeping in Term A.III.1.

4. USEPA Methods 24 and 24A shall be used to determine the OC contents for the coatings and cleanup materials employed in this emissions unit. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
5. Compliance with the visible particulate limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

VI. Miscellaneous Requirements

None.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K002 - Ransburg Paintline 1	Air Toxics Policy	See Term B.VI.1

2. Additional Terms and Conditions

None.

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

- The permit to install for this emissions unit K002 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 Ground-Level Concentration (MAGLC).

Issued: To be entered upon final issuance

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

Pollutant : Ethylene Glycol

TLV (ug/m3): 253,900

Maximum Hourly Emission Rate (lbs/hr): 11.5

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 1531.0

MAGLC (ug/m3): 6045.2

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics 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 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.).

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

The permittee shall collect, record, and retain the following information when it conducts

Pease Industries Incorporated

PTI Application: 14-05064

Issued

Facility ID: 1409030092

Emissions Unit ID: K002

evaluations to determine that the changed emissions unit will 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 it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. when the 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.

Pease

PTI A

Emissions Unit ID: K003

Issued: To be entered upon final issuance**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
K003 - Doorline #2 with Reverse Rollcoater	OAC rule 3745-31-05 (A)(3)	OAC rule 3745-21-09 (U)(1)(c) OAC rule 3745-21-07 (G)
	OAC rule 3745-17-07 (A)(1)	
	OAC rule 3745-17-11	

Pease

PTI A

Emissions Unit ID: K003

Issued: To be entered upon final issuance

Applicable Emissions Limitations/Control Measures	Exempt
<p>2.6 lbs OC/ hour (non-metal parts) 39.2 lbs OC/hour (metal parts) 20.0 tons/year OC*</p>	
<p>0.38 lb PM-PM10/ hour 1.7 TPY PM-PM10 /year</p>	
<p>See Terms A.I.2.e. and A.II.1</p>	
<p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1) and OAC rule 3745-21-09(U)(1)(c).</p>	
<p>* Based upon a rolling, 12-month summation. Combined emissions for emissions units K001, K003, K004 and K006.</p>	
<p>See Term A.I.2.a.</p>	
<p>The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).</p>	
<p>See Term A.I.2.b.</p>	

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

- 2.a** The visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- 2.b** The OC content as applied of each of the coatings employed in emissions unit K003 shall not exceed 3.5 pounds per gallon for metal parts, excluding water and exempt solvents.
- 2.c** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the usage and emissions limits and the use of compliance coatings.
- 2.d** The hourly emission limitations outlined in Term A.I.1. are based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.e** The use of photochemically reactive material as defined in OAC rule 3745-21-01 (C)(5) is prohibited (for non-metal parts).

II. Operational Restrictions

1. The permittee shall not employ more than 20.0 tons of OC per year in emissions units K001, K003, K004 and K006, combined based upon a rolling, 12-month summation of the OC input figures.

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

Month(s)	Maximum Allowable Cumulative Input Rates of OC (tons)
1	1.7
1-2	3.4
1-3	5.1
1-4	6.8
1-5	8.5
1-6	10.2
1-7	11.9
1-8	13.6
1-9	15.3
1-10	17.0

Issued: To be entered upon final issuance

1-11	18.7
1-12	20.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual OC input limitation shall be based upon a rolling, 12-month summation of the OC input figures.

The OC input figures are equivalent to the OC emission rates and are based upon 100% of the solvent in the coating materials being emitted.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions unit K003 :
 - a. The name and identification number of each coating, as applied and the type of material it is used to coat (metal or non-metal);
 - b. The number of gallons of each coating employed;
 - c. The OC content of each coating, in pounds per gallon, as applied;
 - d. The OC content of each coating, in pounds per gallon (excluding water and exempt solvents), as applied;
 - e. The total OC emissions (input) from all coatings, in pounds (b x c); and,
 - f. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the OC emission (input) figures for emissions units K001, K003, K004 and K006, combined.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative OC emissions (input) for each calendar month.

Note: The permittee may track the coating usage based on the number of doors produced and use a coating usage factor (gallons of coating used per door produced) to calculate the gallons of coating used from the number of doors manufactured. The permittee shall update the factor every six calendar months using actual inventory records if such a factor is used. The calculations used to develop the coating usage factor shall be maintained on file.

Emissions Unit ID: K003

2. The permittee shall collect and record the following information each month:
 - a. The company identification of each liquid organic material employed in this emissions unit; and,
 - b. A record of each liquid organic material employed in this emissions unit indicating, whether or not the liquid organic material is photochemically reactive as identified in OAC rule 3745-21-01(C)(5).

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month OC input limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative OC input levels.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month OC emission limitation.
3. The permittee shall submit an annual report for emissions unit K003 which lists the total OC emissions for the calendar year. This report shall be submitted by January 31 of each year and shall cover the previous calendar year.
4. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings in emissions unit K003 (for metal parts). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
5. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit (for non-metal parts). This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of material(s) emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.
6. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

1. The permittee shall calculate the OC emission rate for each emissions unit by multiplying the OC content by the coating usage rate unless otherwise stated in this permit.
2. Compliance with the emissions and usage limits cited in Term A.I.1 shall be demonstrated by the record keeping in Term A.III.1.

Issued: To be entered upon final issuance

3. Compliance with the rolling, 12-month summation limits cited in Term A.II.1 shall be demonstrated by the record keeping in Term A.III.1.
4. USEPA Methods 24 and 24A shall be used to determine the OC contents for the coatings and cleanup materials employed in this emissions unit. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
5. Compliance with the visible particulate limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

VI. Miscellaneous Requirements

None.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K003 - Doorline #2 with Reverse Rollcoater	None	See Term B.VI.1

2. Additional Terms and Conditions

None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

None.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

- Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

38

Pease

PTI A

Issued: To be entered upon final issuance

Emissions Unit ID: K003

Pease
PTI A

Emissions Unit ID: K004

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
K004 - Doorline #3 with Reverse Rollcoater	OAC rule 3745-31-05 (A)(3)	OAC rule 3745-21-09 (U)(1)(c) OAC rule 3745-21-07 (G) OAC rule 3745-31-05(D)
	OAC rule 3745-17-07 (A)(1)	
	OAC rule 3745-17-11	

Pease

PTI A

Issued: To be entered upon final issuance

<u>Applicable Emissions Limitations/Control Measures</u>	Exempt See Term A.I.2.e
2.6 lbs OC/ hour (non-metal parts) 39.2 lbs OC/hour (metal parts) 20.0 tons/year OC*	
0.38 lb PM-PM10/ hour 1.7 tons/year PM-PM10	
See Terms A.I.2.f. and A.II.1.	
The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), OAC rule 3745-21-09(U)(1)(c) and OAC rule 3745-31-05(D).	
* Based upon a rolling, 12-month summation. Combined emissions for emissions units K001, K003, K004 and K006.	
See Term A.I.2.a.	
The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).	
See term A.I.2.b.	

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

- 2.a** The visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- 2.b** The OC content as applied of each of the coatings employed in emissions unit K004 shall not exceed 3.5 pounds per gallon for metal parts, excluding water and exempt solvents.
- 2.c** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the usage and emissions limits and the use of compliance coatings.
- 2.d** The hourly emission limitations outlined in Term A.1. are based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.e** The actual usage of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from this emissions unit shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

The permittee already has existing HAPs records, therefore, HAPs emission limits for the first 12 months of operation following the issuance of this permit are not required.

- 2.f** The use of photochemically reactive material as defined in OAC rule 3745-21-01 (C)(5) is prohibited (for non-metal parts).

II. Operational Restrictions

1. The permittee shall not employ more than 20.0 tons of OC per year in emissions units K001, K003, K004 and K006, combined based upon a rolling, 12-month summation of the OC input figures.

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

Month(s)	Maximum Allowable Cumulative Input Rates of OC (tons)
1	1.7
1-2	3.4

Emissions Unit ID: K004

1-3	5.1
1-4	6.8
1-5	8.5
1-6	10.2
1-7	11.9
1-8	13.6
1-9	15.3
1-10	17.0
1-11	18.7
1-12	20.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual OC input limitation shall be based upon a rolling, 12-month summation of the OC input figures.

The OC input figures are equivalent to the OC emission rates and are based upon 100% of the solvent in the coating materials being emitted.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions unit K004 :
 - a. The name and identification number of each coating, as applied and the type of material it is used to coat (metal or non-metal);
 - b. The number of gallons of each coating employed;
 - c. The OC content of each coating, in pounds per gallon, as applied;
 - d. The OC content of each coating, in pounds per gallon (excluding water and exempt solvents), as applied;
 - e. The total OC emissions (input) from all coatings, in pounds (b x c); and,
 - f. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the OC emission (input) figures for emissions units K001, K003, K004 and K006, combined.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative OC emissions (input) for each calendar month.

Note: The permittee may track the coating usage based on the number of doors produced and use a coating usage factor (gallons of coating used per door produced) to calculate

Issued: To be entered upon final issuance

the gallons of coating used from the number of doors manufactured. The permittee shall update the factor every six calendar months using actual inventory records if such a factor is used. The calculations used to develop the coating usage factor shall be maintained on file.

2. The permittee shall collect and record the following information each month:
 - a. The company identification of each liquid organic material employed in this emissions unit; and,
 - b. A record of each liquid organic material employed in this emissions unit indicating, whether or not the liquid organic material is photochemically reactive as identified in OAC rule 3745-21-01(C)(5).

3. The permittee shall collect and record the following information each month for this emissions unit:
 - a. The name and identification number of each coating, as applied.
 - b. The individual HAP content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.
 - c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)].
 - d. The number of gallons of each coating employed.
 - e. The name and identification of each cleanup material employed.
 - f. The individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon of cleanup material, as applied.
 - g. The total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (f)].
 - h. The number of gallons of each cleanup material employed.
 - i. The total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating and the sum of (f) times (h) for each cleanup material].
 - j. The total combined HAP emissions from all coatings and cleanup materials employed, in

Emissions Unit ID: K004

pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material].

- k. The updated rolling, 12-month summation for individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
- l. The updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

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 field office or local air agency contact. This information does not have to be kept on a line-by-line basis.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month OC input limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative OC input levels.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month OC emission limitation.
3. The permittee shall submit an annual report for emissions unit K004 which lists the total OC emissions for the calendar year. This report shall be submitted by January 31 of each year and shall cover the previous calendar year.
4. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings in emissions unit K004 (for metal parts). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
5. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit (for non-metal parts). This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of material(s) emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.
6. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emissions limitations set forth in this Permit to Install. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of

Issued: To be entered upon final issuance

each year. If no exceedances occurred during the reporting period then a report is required stating so.

7. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

Pease**PTI A**

Emissions Unit ID: K004

Issued: To be entered upon final issuance**V. Testing Requirements**

1. The permittee shall calculate the OC emission rate for each emissions unit by multiplying the OC content by the coating usage rate unless otherwise stated in this permit.
2. Compliance with the emissions and usage limits cited in Term A.I.1 shall be demonstrated by the record keeping in Term A.III.1.
3. Compliance with the rolling, 12-month summation limits cited in Term A.II.2 shall be demonstrated by the record keeping in Term A.III.1.
4. USEPA Methods 24 and 24A shall be used to determine the OC contents for the coatings and cleanup materials employed in this emissions unit. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
5. Compliance with the emissions limits cited in Term A.I.2.e shall be demonstrated by the record keeping in Term A.III.3.
6. Compliance with the visible particulate limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

VI. Miscellaneous Requirements

None.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K004 - Doorline #3 with Reverse Rollcoater	None	See term B.VI.1

2. Additional Terms and Conditions

None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

None.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

- Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

48

Pease

PTI A

Issued: To be entered upon final issuance

Emissions Unit ID: K004

Pease
PTI A

Emissions Unit ID: K006

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
K006 - Side Light Line	OAC rule 3745-31-05 (A)(3)	OAC rule 3745-21-09 (U)(1)(c) OAC rule 3745-21-07 (G) OAC rule 3745-31-05(D)
	OAC rule 3745-17-07 (A)(1)	
	OAC rule 3745-17-11	

Pease**PTI A**

Emissions Unit ID: K006

Issued: To be entered upon final issuance

<u>Applicable Emissions Limitations/Control Measures</u>	Exempt See Term A.I.2.e
2.6 lbs OC/ hour (non-metal parts) 39.2 lbs OC/hour (metal parts) 20.0 tons/year OC*	
0.38 lbs PM-PM10/ hour 1.7 tons/year PM-PM10	
See Terms A.I.2.f. and A.II.1.	
The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), OAC rule 3745-21-09(U)(1)(c) and OAC rule 3745-31-05(D).	
* Based upon a rolling, 12-month summation. Combined emissions for emissions units K001, K003, K004 and K006.	
See Term A.I.2.a.	
The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).	
See term A.I.2.b.	

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

- 2.a** The visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- 2.b** The OC content as applied of each of the coatings employed in emissions unit K006 shall not exceed 3.5 pounds per gallon for metal parts, excluding water and exempt solvents.
- 2.c** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the usage and emissions limits and the use of compliance coatings.
- 2.d** The hourly emission limitations outlined in Term A.1. are based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.e** The actual usage of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from this emissions unit shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

The permittee already has existing HAPs records, therefore, HAPs emission limits for the first 12 months of operation following the issuance of this permit are not required.

- 2.f** The use of photochemically reactive material as defined in OAC rule 3745-21-01 (C)(5) is prohibited (for non-metal parts).

II. Operational Restrictions

1. The permittee shall not employ more than 20.0 tons of OC per year in emissions units K001, K003, K004 and K006, combined based upon a rolling, 12-month summation of the OC input figures.

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

Month(s)	Maximum Allowable Cumulative Input Rates of OC (tons)
1	1.7
1-2	3.4

Emissions Unit ID: K006

1-3	5.1
1-4	6.8
1-5	8.5
1-6	10.2
1-7	11.9
1-8	13.6
1-9	15.3
1-10	17.0
1-11	18.7
1-12	20.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual OC input limitation shall be based upon a rolling, 12-month summation of the OC input figures.

The OC input figures are equivalent to the OC emission rates and are based upon 100% of the solvent in the coating materials being emitted.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions unit K006 :
 - a. The name and identification number of each coating, as applied and the type of material it is used to coat (metal or non-metal);
 - b. The number of gallons of each coating employed;
 - c. The OC content of each coating, in pounds per gallon, as applied;
 - d. The OC content of each coating, in pounds per gallon (excluding water and exempt solvents), as applied;
 - e. The total OC emissions (input) from all coatings, in pounds (b x c); and,
 - f. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the OC emission (input) figures for emissions units K001, K003, K004 and K006, combined.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative coating usage for each calendar month.

Note: The permittee may track the coating usage based on the number of doors produced and use a coating usage factor (gallons of coating used per door produced) to calculate the gallons of coating used from the number of doors manufactured. The permittee shall

Issued: To be entered upon final issuance

update the factor every six calendar months using actual inventory records if such a factor is used. The calculations used to develop the coating usage factor shall be maintained on file.

2. The permittee shall collect and record the following information each month:
 - a. The company identification of each liquid organic material employed in this emissions unit; and,
 - b. A record of each liquid organic material employed in this emissions unit indicating, whether or not the liquid organic material is photochemically reactive as identified in OAC rule 3745-21-01(C)(5).

3. The permittee shall collect and record the following information each month for this emissions unit:
 - a. The name and identification number of each coating, as applied.
 - b. The individual HAP content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.
 - c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)].
 - d. The number of gallons of each coating employed.
 - e. The name and identification of each cleanup material employed.
 - f. The individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon of cleanup material, as applied.
 - g. The total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (f)].
 - h. The number of gallons of each cleanup material employed.
 - i. The total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating and the sum of (f) times (h) for each cleanup material].
 - j. The total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g)

Emissions Unit ID: K006

times (h) for each cleanup material].

- k. The updated rolling, 12-month summation for individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
- l. The updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

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 field office or local air agency contact. This information does not have to be kept on a line-by-line basis.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month OC input limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative OC input levels.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month OC emission limitation.
3. The permittee shall submit an annual report for emissions unit K006 which lists the total OC emissions for the calendar year. This report shall be submitted by January 31 of each year and shall cover the previous calendar year.
4. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings in emissions unit K006 (for metal parts). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
5. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit (for non-metal parts). This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of material(s) emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.
6. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emissions limitations set forth in this Permit to Install. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year. If no exceedances occurred during the reporting period then a report is required stating

Issued: To be entered upon final issuance

so.

7. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

Issued: To be entered upon final issuance

V. Testing Requirements

1. The permittee shall calculate the OC emission rate for each emissions unit by multiplying the OC content by the coating usage rate unless otherwise stated in this permit.
2. Compliance with the emission limits cited in Term A.I.1 shall be demonstrated by the record keeping in Term A.III.1.
3. Compliance with the rolling, 12-month summation usage limits cited in Term A.II.1 shall be demonstrated by the record keeping in Term A.III.1.
4. USEPA Methods 24 and 24A shall be used to determine the OC contents for the coatings and cleanup materials employed in this emissions unit. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
5. Compliance with the emissions limits cited in Term A.I.2.e shall be demonstrated by the record keeping in Term A.III.3.
6. Compliance with the visible particulate limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

VI. Miscellaneous Requirements

None.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K006 - Side Light Line	None	See Term B.VI.1

2. Additional Terms and Conditions

None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

None.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

- Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
K007 - Ransburg Paintline 2	OAC rule 3745-31-05 (A)(3)	OAC rule 3745-21-07 (G) OAC rule 3745-31-05(D)
	OAC rule 3745-17-07 (A)	
	OAC rule 3745-17-11	
	OAC rule 3745-21-09 (U)(1)(i)	

Pease**PTI A**

Emissions Unit ID: K007

Issued: To be entered upon final issuance

<u>Applicable Emissions Limitations/Control Measures</u>	Exempt
276.0 lbs OC/day 40.0 tons/yr OC*	See Term A.I.2.e.
0.23 lb PM-PM10/day 1.0 ton/year PM-PM10	
See Terms A.I.2.f. and A.II.1.	
The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1) and 3745-31-05(D).	
* Based upon a rolling, 12-month summation. Combined emissions for emissions units K002 and K007.	
See Term A.I.2.a.	
The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).	
The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).	

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

- 2.a** The visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- 2.b** The OC content as applied of each of the coatings employed in emissions unit K007 shall not exceed 0.6 pounds per gallon.
- 2.c** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the usage and emissions limits, use of compliance coatings and compliance with the Ohio EPA Air Toxics policy.
- 2.d** The hourly emission limitation outlined in Term A.1. is based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with this limit.
- 2.e** The actual usage of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from this emissions unit shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.
- The permittee already has existing HAPs records, therefore, HAPs emission limits for the first 12 months of operation following the issuance of this permit are not required.
- 2.f** The use of photochemically reactive material as defined in OAC rule 3745-21-01 (C)(5) is prohibited (for non-metal parts).

II. Operational Restrictions

1. The permittee shall not employ more than 40.0 tons of OC per year in emissions units K002 and K007 combined based upon a rolling, 12-month summation of the OC input figures.

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

Month(s)	Maximum Allowable Cumulative Input Rates of OC (tons)
1	3.3
1-2	6.6
1-3	9.9

Emissions Unit ID: K007

1-4	13.2
1-5	16.5
1-6	19.8
1-7	23.1
1-8	26.4
1-9	29.7
1-10	33.0
1-11	36.3
1-12	40.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual OC input limitation shall be based upon a rolling, 12-month summation of the OC input figures.

The OC input figures are equivalent to the OC emission rates and are based upon 100% of the solvent in the coating materials being emitted.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions unit K007 :
 - a. The name and identification number of each coating, as applied and the type of material it is used to coat (metal or non-metal);
 - b. The number of gallons of each coating employed;
 - c. The OC content of each coating, in pounds per gallon, as applied;
 - d. The OC content of each coating, in pounds per gallon (excluding water and exempt solvents), as applied;
 - e. The total OC emissions (input) from all coatings, in pounds (b x c); and,
 - f. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the OC emissions (input) figures for emissions units K002 and K007 combined..

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative OC emissions input for each calendar month.

Note: The permittee may track the coating usage based on the number of doors produced and use a coating usage factor (gallons of coating used per door produced) to calculate the gallons of coating used from the number of doors manufactured. The permittee shall

Issued: To be entered upon final issuance

update the factor every six calendar months using actual inventory records if such a factor is used. The calculations used to develop the coating usage factor shall be maintained on file.

2. The permittee shall collect and record the following information each month:
 - a. The company identification of each liquid organic material employed in this emissions unit; and,
 - b. A record of each liquid organic material employed in this emissions unit indicating, whether or not the liquid organic material is photochemically reactive as identified in OAC rule 3745-21-01(C)(5).

3. The permittee shall collect and record the following information each month for this emissions unit:
 - a. The name and identification number of each coating, as applied.
 - b. The individual HAP content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.
 - c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)].
 - d. The number of gallons of each coating employed.
 - e. The name and identification of each cleanup material employed.
 - f. The individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon of cleanup material, as applied.
 - g. The total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (f)].
 - h. The number of gallons of each cleanup material employed.
 - i. The total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating and the sum of (f) times (h) for each cleanup material].
 - j. The total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g)

Emissions Unit ID: K007

times (h) for each cleanup material].

- k. The updated rolling, 12-month summation for individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
- l. The updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

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 field office or local air agency contact. This information does not have to be kept on a line-by-line basis.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month OC input limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative OC input levels.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month OC emission limitation.
3. The permittee shall submit an annual report for emissions unit K007 which lists the total OC emissions for the calendar year. This report shall be submitted by January 31 of each year and shall cover the previous calendar year.
4. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings in emissions unit K007. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
5. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit (for non-metal parts). This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of material(s) emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.
6. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emissions limitations set forth in this Permit to Install. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year. If no exceedances occurred during the reporting period then a report is required stating

Issued: To be entered upon final issuance

so.

7. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

1. The permittee shall calculate the OC emission rate for each emissions unit by multiplying the OC content by the coating usage rate unless otherwise stated in this permit.
2. Compliance with the emissions limits cited in Term A.I.1 shall be demonstrated by the record keeping in Term A.III.1.
3. Compliance with the rolling, 12-month summation usage limits cited in Term A.I.1 shall be demonstrated by the record keeping in Term A.III.1.
4. USEPA Methods 24 and 24A shall be used to determine the OC contents for the coatings and cleanup materials employed in this emissions unit. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
5. Compliance with the emissions limits cited in Term A.I.2.e shall be demonstrated by the record keeping in Term A.III.3.
6. Compliance with the visible particulate limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

VI. Miscellaneous Requirements

None.

Issued: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K007 - Ransburg Paintline 2	Air Toxics Policy	See term B.VI.1

2. Additional Terms and Conditions

None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

1. The permit to install for this emissions unit K007 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

Issued: To be entered upon final issuance

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 Ground-Level Concentration (MAGLC).

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

Pollutant : Ethylene Glycol

TLV (ug/m3): 253,900

Maximum Hourly Emission Rate (lbs/hr): 11.5

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 1531.0

MAGLC (ug/m3): 6045.2

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics 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 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.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule

Pease Industries Incorporated

PTI Application: 14-05064

Issued

Facility ID: 1409030092

Emissions Unit ID: K007

3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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 it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. when the 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.

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P014 - Glass Department	OAC rule 3745-31-05 (A)(3)	<p><u>For resin:</u> 0.51 lb OC/hour 12.2 lbs OC/day 2.2 tons/ year OC *</p> <p><u>For clean-up material:</u> 1320 lbs OC/ month 7.8 tons/ year OC *</p> <p>See Term A.I.2.c</p> <p>* Based on a rolling, 12-month summation.</p> <p>Exempt</p>
	OAC rule 3745-21-07 (G)	

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the usage and emissions limits.
- 2.b The hourly and daily emission limitation outlined in Term A.I.1. is based upon the emissions unit's potential to emit. Therefore, no hourly or daily records are required to demonstrate compliance with these limits.
- 2.c The use of photochemically reactive material clean-up materials as defined in OAC rule

Issued: To be entered upon final issuance

3745-21-01 (C)(5) is prohibited.

II. Operational Restrictions

1. The maximum annual resin usage in emissions unit P014 shall not exceed 52,560 gallons per year based upon a rolling, 12-month summation of the resin usage figures.

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

Month(s)	Maximum Allowable Cumulative Resin Usage (in gallons)
1	4,380
1-2	8,760
1-3	13,140
1-4	17,520
1-5	21,900
1-6	26,280
1-7	30,660
1-8	35,040
1-9	39,420
1-10	43,800
1-11	48,180
1-12	52,560

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

2. The maximum annual clean-up material usage in emissions unit P014 shall not exceed 3,200 gallons per year based upon a rolling, 12-month summation of the clean-up usage figures.

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

Month(s)	Maximum Allowable Cumulative Clean-up Material Usage (in gallons)
1	266
1-2	532
1-3	798
1-4	1,064
1-5	1,330
1-6	1,596
1-7	1,862
1-8	2,128
1-9	2,394
1-10	2,660
1-11	2,926
1-12	3,200

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual usage limitation shall be based upon a rolling, 12-month summation of the clean-up material usage figures.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions unit P014 :
 - a. The name and identification number of each resin and clean-up material, as applied;
 - b. The number of gallons of each resin and clean-up material employed;
 - c. The OC content of each resin and clean-up material, in pounds per gallon, as applied;
 - d. The total OC emissions from all resin and clean-up materials, in pounds (b x c); and,
 - f. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the resin and clean-up material usage figures for this emissions unit.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative resin and clean-up material usage for each calendar month.

Note: The permittee may track the resin usage based on the number of doors produced and use a coating usage factor (gallons of coating used per door produced) to calculate the gallons of coating used from the number of doors manufactured. The permittee shall

Issued: To be entered upon final issuance

update the factor every six calendar months using actual inventory records if such a factor is used. The calculations used to develop the coating usage factor shall be maintained on file.

- g. The updated rolling, 12-month summation of the total OC emissions from the resin and clean-up materials.
2. The permittee shall collect and record the following information each month:
 - a. The company identification of each liquid organic material employed in this emissions unit; and,
 - b. A record of each liquid organic material employed in this emissions unit indicating, whether or not the liquid organic material is photochemically reactive as identified in OAC rule 3745-21-01(C)(5).

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports for emissions unit P014 which identify all exceedances of the rolling, 12-month resin and clean-up material usage limitations and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative resin and clean-up material usage levels.
2. The permittee shall submit an annual report for emissions unit P014 which lists the total OC emissions for the calendar year. This report shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive clean-up material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive clean-up material(s) and the estimated total quantity of material(s) emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.

V. Testing Requirements

1. The permittee shall calculate the OC emission rate for each emissions unit by multiplying the OC content by the resin and clean-up usage rate unless otherwise stated in this permit.
2. Compliance with the usage limits cited in Term A.II.1 and A.II.2 shall be demonstrated by the record keeping in Term A.III.1.

Issued: To be entered upon final issuance

3. USEPA Methods 24 and 24A shall be used to determine the OC contents for the coatings and cleanup materials employed in this emissions unit. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

VI. Miscellaneous Requirements

None.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P014 - Glass Department	Air Toxics Policy	See Term B.VI.1.

2. Additional Terms and Conditions

None

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

None..

IV. Reporting Requirements

None.

V. Testing Requirements

None

VI. Miscellaneous Requirements

- The permit to install for this emissions unit P014 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 Ground-Level Concentration (MAGLC).

Issued: To be entered upon final issuance

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

Pollutant : Styrene

TLV (ug/m3): 85,200

Maximum Hourly Emission Rate (lbs/hr): 0.42

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 35.1

MAGLC (ug/m3): 2028.6

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics 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 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.).

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

The permittee shall collect, record, and retain the following information when it conducts

Issued: To be entered upon final issuance

evaluations to determine that the changed emissions unit will 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 it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. when the 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.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R011 - Finishing Booth - SB1	OAC rule 3745-31-05 (A)(3)	See term A.I.2.a, A.I.2.b, A.I.2.c., A.I.2.e and A.I.2.i. 0.1 lb PM-PM10/ hour 0.44 ton/ year PM-PM10 The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1) and OAC rule 3745-21-09(U)(1)(c).
	OAC rule 3745-17-07 (A)	See Term A.I.2.d.
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-09 (U)(1)(c)	See Term A.I.2.f.
	OAC rule 3745-21-07 (G)	Exempt

2. Additional Terms and Conditions

- 2.a The organic compound emissions from emissions unit R011 shall not exceed 210 pounds per day when coating metal parts.
- 2.b The organic compound emissions from emissions unit R011 shall not exceed 293 pounds per day when coating non-metal parts.

Issued: To be entered upon final issuance

- 2.c** The permittee shall not employ more than 18.0 tons of OC per year in emissions units R011 - R015, combined based upon a rolling 12-month summation of the OC input figures.

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

Month(s)	Maximum Allowable Cumulative Input Rates of OC (in tons)
1	1.5
1-2	3.0
1-3	4.5
1-4	6.0
1-5	7.5
1-6	9.0
1-7	10.5
1-8	12.0
1-9	13.5
1-10	15.0
1-11	16.5
1-12	18.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual OC input limitation shall be based upon a rolling, 12-month summation of the OC input figures.

The OC input figures are equivalent to the OC emission rates and are based upon 100% of the solvent in the coating materials being emitted.

- 2.d** The visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- 2.e** The OC content of each coating for non-metal parts employed in this emissions unit shall not exceed 7.3 pounds per gallon, as-applied.
- 2.f** The OC content of each coating for metal parts employed in this emissions unit shall not exceed 3.5 pounds per gallon, excluding water and exempt solvents.

Issued: To be entered upon final issuance

- 2.g** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emission limits, use of compliance coatings and compliance with the Ohio EPA Air Toxics policy.
- 2.h** The hourly and daily emission limitations outlined in Term A.I.1. are based upon the emissions unit's potential to emit. Therefore, no hourly or daily records are required to demonstrate compliance with these limits.
- 2.i** The use of photochemically reactive material as defined in OAC rule 3745-21-01 (C)(5) is prohibited (for non-metal parts).

II. Operational Restrictions

- 1. None.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain monthly records of the following information for emissions units R011 - R015 :
 - a. The name, identification number and type of material coated (metal or non-metal) for each coating, as applied;
 - b. The OC content of each coating, in pounds per gallon, as applied;
 - c. The OC content of each coating, in pounds per gallon (excluding water and exempt solvents), as applied;
 - d. The number of gallons of each coating employed;
 - e. The total OC emissions (input) from all coatings, in pounds (b x d); and,
 - f. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the OC emissions (input) figures for emissions units R011 - R015, combined.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative OC emissions (input) for each calendar month.

Note: The permittee may track the organic compound emissions based on the number of doors produced and use a coating usage factor (gallons of coating used per door

Emissions Unit ID: R011

produced) to calculate the gallons of coating used from the number of doors manufactured. The permittee shall update the factor every six calendar months using actual inventory records if such a factor is used. The calculations used to develop the cumulative organic compound emissions factor shall be maintained on file.

2. The permittee shall collect and record the following information each month:
 - a. The company identification of each liquid organic material employed in this emissions unit; and,
 - b. A record of each liquid organic material employed in this emissions unit indicating, whether or not the liquid organic material is photochemically reactive as identified in OAC rule 3745-21-01(C)(5).

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports for emissions units R011 - R015 which identify all exceedances of the rolling, 12-month OC input limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative OC input levels.
2. The permittee shall submit an annual report for emissions unit R011 - R015 which lists the total OC emissions for the calendar year. This report shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings in emissions units R011 - R015. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
4. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit (for non-metal parts). This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of material(s) emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.
5. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

1. The permittee shall calculate the OC emission rate for each emissions unit by multiplying the OC content by the coating usage rate unless otherwise stated in this permit.

Issued: To be entered upon final issuance

2. Compliance with the rolling, 12-month summation OC emission limits cited in Term A.II.2.c shall be demonstrated by the record keeping in Term A.III.1.
3. USEPA Methods 24 and 24A shall be used to determine the OC contents for the coatings and cleanup materials employed in this emissions unit. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
4. Compliance with the visible particulate limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

VI. Miscellaneous Requirements

None.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R011 - Finishing Booth - SB1	Air Toxics Policy	See term B.VI.1

2. Additional Terms and Conditions

None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

None.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

- 1. The permit to install for this emissions unit R011 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 Ground-Level Concentration (MAGLC).

Issued: To be entered upon final issuance

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

Pollutant : Toluene

TLV (ug/m3): 188,400

Maximum Hourly Emission Rate (lbs/hr): 17.4

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 478.8

MAGLC (ug/m3): 4485.7

Physical changes to or 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 Toxics 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 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.).

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

Issued: To be entered upon final issuance

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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 it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. when the 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.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R012 - Finishing Booth - SB2	OAC rule 3745-31-05 (A)(3)	See term A.I.2.a, A.I.2.b, A.I.2.c., A.I.2.e and A.I.2.i. 0.1 lb PM-PM10/ hour 0.44 ton/ year PM-PM10 The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1) and OAC rule 3745-21-09(U)(1)(c).
	OAC rule 3745-17-07 (A)	See Term A.I.2.d.
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-09 (U)(1)(c)	See Term A.I.2.f.
	OAC rule 3745-21-07 (G)	Exempt

2. Additional Terms and Conditions

- 2.a The organic compound emissions from emissions unit R011 shall not exceed 210 pounds per day when coating metal parts.
- 2.b The organic compound emissions from emissions unit R011 shall not exceed 293 pounds per day when coating non-metal parts.

Issued: To be entered upon final issuance

- 2.c** The permittee shall not employ more than 18.0 tons of OC per year in emissions units R011 - R015, combined based upon a rolling 12-month summation of the OC input figures.

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

Month(s)	Maximum Allowable Cumulative Input Rates of OC (in tons)
1	1.5
1-2	3.0
1-3	4.5
1-4	6.0
1-5	7.5
1-6	9.0
1-7	10.5
1-8	12.0
1-9	13.5
1-10	15.0
1-11	16.5
1-12	18.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual OC input limitation shall be based upon a rolling, 12-month summation of the OC input figures.

The OC input figures are equivalent to the OC emission rates and are based upon 100% of the solvent in the coating materials being emitted.

- 2.d** The visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- 2.e** The OC content of each coating for non-metal parts employed in this emissions unit shall not exceed 7.3 pounds per gallon, as-applied.
- 2.f** The OC content of each coating for metal parts employed in this emissions unit shall not exceed 3.5 pounds per gallon, excluding water and exempt solvents.

Issued: To be entered upon final issuance

- 2.g** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emission limits, use of compliance coatings and compliance with the Ohio EPA Air Toxics policy.
- 2.h** The hourly and daily emission limitations outlined in Term A.I.1. are based upon the emissions unit's potential to emit. Therefore, no hourly or daily records are required to demonstrate compliance with these limits.
- 2.i** The use of photochemically reactive material as defined in OAC rule 3745-21-01 (C)(5) is prohibited (for non-metal parts).

II. Operational Restrictions

- 1. None

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain monthly records of the following information for emissions units R011 - R015 :
 - a. The name, identification number and type of material coated (metal or non-metal) for each coating, as applied;
 - b. The OC content of each coating, in pounds per gallon, as applied;
 - c. The OC content of each coating, in pounds per gallon (excluding water and exempt solvents), as applied;
 - d. The number of gallons of each coating employed;
 - e. The total OC emissions (input) from all coatings, in pounds (b x d); and,
 - f. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the OC emissions (input) figures for emissions units R011 - R015, combined.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative OC emissions (input) for each calendar month.

Note: The permittee may track the organic compound emissions based on the number of doors produced and use a coating usage factor (gallons of coating used per door

Emissions Unit ID: R012

produced) to calculate the gallons of coating used from the number of doors manufactured. The permittee shall update the factor every six calendar months using actual inventory records if such a factor is used. The calculations used to develop the cumulative organic compound emissions factor shall be maintained on file.

2. The permittee shall collect and record the following information each month:
 - a. The company identification of each liquid organic material employed in this emissions unit; and,
 - b. A record of each liquid organic material employed in this emissions unit indicating, whether or not the liquid organic material is photochemically reactive as identified in OAC rule 3745-21-01(C)(5).

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports for emissions units R011 - R015 which identify all exceedances of the rolling, 12-month OC input limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative OC input levels.
2. The permittee shall submit an annual report for emissions unit R011 - R015 which lists the total OC emissions for the calendar year. This report shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings in emissions units R011 - R015. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
4. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit (for non-metal parts). This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of material(s) emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.
5. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

1. The permittee shall calculate the OC emission rate for each emissions unit by multiplying the OC content by the coating usage rate unless otherwise stated in this permit.

Issued: To be entered upon final issuance

2. Compliance with the rolling, 12-month summation OC emission limits cited in Term A.II.2.c shall be demonstrated by the record keeping in Term A.III.1.
3. USEPA Methods 24 and 24A shall be used to determine the OC contents for the coatings and cleanup materials employed in this emissions unit. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
4. Compliance with the visible particulate limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

VI. Miscellaneous Requirements

None.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R012 - Finishing Booth - SB2	Air Toxics Policy	See Term B.VI.1

2. Additional Terms and Conditions

None

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None.

VI. Miscellaneous Requirements

1. The permit to install for this emissions unit R012 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 Ground-Level Concentration (MAGLC).

Issued: To be entered upon final issuance

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

Pollutant : Toluene

TLV (ug/m3): 188,400

Maximum Hourly Emission Rate (lbs/hr): 17.4

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 478.8

MAGLC (ug/m3): 4485.7

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics 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 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.).

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

Issued: To be entered upon final issuance

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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 it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. when the 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.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R013 - Finishing Booth - SB3	OAC rule 3745-31-05 (A)(3)	See term A.I.2.a, A.I.2.b, A.I.2.c., A.I.2.e and A.I.2.i. 0.1 lb PM-PM10/ hour 0.44 ton/ year PM-PM10 The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1) and OAC rule 3745-21-09(U)(1)(c).
	OAC rule 3745-17-07 (A)	See Term A.I.2.d.
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-09 (U)(1)(c)	See Term A.I.2.f.
	OAC rule 3745-21-07 (G)	Exempt

2. Additional Terms and Conditions

- 2.a The organic compound emissions from emissions unit R011 shall not exceed 210 pounds per day when coating metal parts.
- 2.b The organic compound emissions from emissions unit R011 shall not exceed 293 pounds per day when coating non-metal parts.

Issued: To be entered upon final issuance

- 2.c** The permittee shall not employ more than 18.0 tons of OC per year in emissions units R011 - R015, combined based upon a rolling 12-month summation of the OC input figures.

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

Month(s)	Maximum Allowable Cumulative Input Rates of OC (in tons)
1	1.5
1-2	3.0
1-3	4.5
1-4	6.0
1-5	7.5
1-6	9.0
1-7	10.5
1-8	12.0
1-9	13.5
1-10	15.0
1-11	16.5
1-12	18.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual OC input limitation shall be based upon a rolling, 12-month summation of the OC input figures.

The OC input figures are equivalent to the OC emission rates and are based upon 100% of the solvent in the coating materials being emitted.

- 2.d** The visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- 2.e** The OC content of each coating for non-metal parts employed in this emissions unit shall not exceed 7.3 pounds per gallon, as-applied.
- 2.f** The OC content of each coating for metal parts employed in this emissions unit shall not exceed 3.5 pounds per gallon, excluding water and exempt solvents.

Issued: To be entered upon final issuance

- 2.g** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emission limits, use of compliance coatings and compliance with the Ohio EPA Air Toxics policy.
- 2.h** The hourly and daily emission limitations outlined in Term A.I.1. are based upon the emissions unit's potential to emit. Therefore, no hourly or daily records are required to demonstrate compliance with these limits.
- 2.i** The use of photochemically reactive material as defined in OAC rule 3745-21-01 (C)(5) is prohibited (for non-metal parts).

II. Operational Restrictions

- 1. None.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain monthly records of the following information for emissions units R011 - R015 :
 - a. The name, identification number and type of material coated (metal or non-metal) for each coating, as applied;
 - b. The OC content of each coating, in pounds per gallon, as applied;
 - c. The OC content of each coating, in pounds per gallon (excluding water and exempt solvents), as applied;
 - d. The number of gallons of each coating employed;
 - e. The total OC emissions (input) from all coatings, in pounds (b x d); and,
 - f. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the OC emissions (input) figures for emissions units R011 - R015, combined.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative OC emissions (input) for each calendar month.

Note: The permittee may track the organic compound emissions based on the number of doors produced and use a coating usage factor (gallons of coating used per door

Emissions Unit ID: R013

produced) to calculate the gallons of coating used from the number of doors manufactured. The permittee shall update the factor every six calendar months using actual inventory records if such a factor is used. The calculations used to develop the cumulative organic compound emissions factor shall be maintained on file.

2. The permittee shall collect and record the following information each month:
 - a. The company identification of each liquid organic material employed in this emissions unit; and,
 - b. A record of each liquid organic material employed in this emissions unit indicating, whether or not the liquid organic material is photochemically reactive as identified in OAC rule 3745-21-01(C)(5).

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports for emissions units R011 - R015 which identify all exceedances of the rolling, 12-month OC input limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative OC input levels.
2. The permittee shall submit an annual report for emissions unit R011 - R015 which lists the total OC emissions for the calendar year. This report shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings in emissions units R011 - R015. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
4. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit (for non-metal parts). This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of material(s) emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.
5. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

1. The permittee shall calculate the OC emission rate for each emissions unit by multiplying the OC content by the coating usage rate unless otherwise stated in this permit.

Issued: To be entered upon final issuance

2. Compliance with the rolling, 12-month summation OC emission limits cited in Term A.II.2.c shall be demonstrated by the record keeping in Term A.III.1.
3. USEPA Methods 24 and 24A shall be used to determine the OC contents for the coatings and cleanup materials employed in this emissions unit. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
4. Compliance with the visible particulate limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

VI. Miscellaneous Requirements

None.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R013 - Finishing Booth - SB3	None	See term B.VI.1.

2. Additional Terms and Conditions

None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

None.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

- 1. The permit to install for this emissions unit R013 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 Ground-Level Concentration (MAGLC).

Issued: To be entered upon final issuance

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

Pollutant : Toluene

TLV (ug/m3): 188,400

Maximum Hourly Emission Rate (lbs/hr): 17.4

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 478.8

MAGLC (ug/m3): 4485.7

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics 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 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.).

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

Issued: To be entered upon final issuance

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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 it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. when the 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.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R014 - Finishing Booth - SB4	OAC rule 3745-31-05 (A)(3)	See term A.I.2.a, A.I.2.b, A.I.2.c., A.I.2.e and A.I.2.i. 0.1 lb PM-PM10/ hour 0.44 ton/ year PM-PM10 The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1) and OAC rule 3745-21-09(U)(1)(c).
	OAC rule 3745-17-07 (A)	See Term A.I.2.d.
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-09 (U)(1)(c)	See Term A.I.2.f.
	OAC rule 3745-21-07 (G)	Exempt

2. Additional Terms and Conditions

- 2.a The organic compound emissions from emissions unit R011 shall not exceed 210 pounds per day when coating metal parts.
- 2.b The organic compound emissions from emissions unit R011 shall not exceed 293 pounds per day when coating non-metal parts.

Issued: To be entered upon final issuance

- 2.c** The permittee shall not employ more than 18.0 tons of OC per year in emissions units R011 - R015, combined based upon a rolling 12-month summation of the OC input figures.

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

Month(s)	Maximum Allowable Cumulative Input Rates of OC (in tons)
1	1.5
1-2	3.0
1-3	4.5
1-4	6.0
1-5	7.5
1-6	9.0
1-7	10.5
1-8	12.0
1-9	13.5
1-10	15.0
1-11	16.5
1-12	18.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual OC input limitation shall be based upon a rolling, 12-month summation of the OC input figures.

The OC input figures are equivalent to the OC emission rates and are based upon 100% of the solvent in the coating materials being emitted.

- 2.d** The visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- 2.e** The OC content of each coating for non-metal parts employed in this emissions unit shall not exceed 7.3 pounds per gallon, as-applied.
- 2.f** The OC content of each coating for metal parts employed in this emissions unit shall not exceed 3.5 pounds per gallon, excluding water and exempt solvents.

Issued: To be entered upon final issuance

- 2.g Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emission limits, use of compliance coatings and compliance with the Ohio EPA Air Toxics policy.
- 2.h The hourly and daily emission limitations outlined in Term A.I.1. are based upon the emissions unit's potential to emit. Therefore, no hourly or daily records are required to demonstrate compliance with these limits.
- 2.i The use of photochemically reactive material as defined in OAC rule 3745-21-01 (C)(5) is prohibited (for non-metal parts).

II. Operational Restrictions

- 1. None.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain monthly records of the following information for emissions units R011 - R015 :
 - a. The name, identification number and type of material coated (metal or non-metal) for each coating, as applied;
 - b. The OC content of each coating, in pounds per gallon, as applied;
 - c. The OC content of each coating, in pounds per gallon (excluding water and exempt solvents), as applied;
 - d. The number of gallons of each coating employed;
 - e. The total OC emissions (input) from all coatings, in pounds (b x d); and,
 - f. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the OC emissions (input) figures for emissions units R011 - R015, combined.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative OC emissions (input) for each calendar month.

Note: The permittee may track the organic compound emissions based on the number of

Emissions Unit ID: R014

doors produced and use a coating usage factor (gallons of coating used per door produced) to calculate the gallons of coating used from the number of doors manufactured. The permittee shall update the factor every six calendar months using actual inventory records if such a factor is used. The calculations used to develop the cumulative organic compound emissions factor shall be maintained on file.

2. The permittee shall collect and record the following information each month:
 - a. The company identification of each liquid organic material employed in this emissions unit; and,
 - b. A record of each liquid organic material employed in this emissions unit indicating, whether or not the liquid organic material is photochemically reactive as identified in OAC rule 3745-21-01(C)(5).

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports for emissions units R011 - R015 which identify all exceedances of the rolling, 12-month OC input limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative OC input levels.
2. The permittee shall submit an annual report for emissions unit R011 - R015 which lists the total OC emissions for the calendar year. This report shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings in emissions units R011 - R015. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
4. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit (for non-metal parts). This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of material(s) emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.
5. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

1. The permittee shall calculate the OC emission rate for each emissions unit by multiplying the OC content by the coating usage rate unless otherwise stated in this permit.

Issued: To be entered upon final issuance

2. Compliance with the rolling, 12-month summation OC emission limits cited in Term A.II.2.c shall be demonstrated by the record keeping in Term A.III.1.
3. USEPA Methods 24 and 24A shall be used to determine the OC contents for the coatings and cleanup materials employed in this emissions unit. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
4. Compliance with the visible particulate limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

VI. Miscellaneous Requirements

None.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R014 - Finishing Booth - SB4	Air Toxics Policy	See term B.VI.6

2. Additional Terms and Conditions

None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

None.

IV. Reporting Requirements

None.

V. Testing Requirements

None.

VI. Miscellaneous Requirements

1. The permit to install for this emissions unit R014 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 Ground-Level Concentration (MAGLC).

Issued: To be entered upon final issuance

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

Pollutant : Toluene

TLV (ug/m3): 188,400

Maximum Hourly Emission Rate (lbs/hr): 17.4

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 478.8

MAGLC (ug/m3): 4485.7

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics 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 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.).

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

Pease Industries Incorporated**PTI Application: 14-05064****Issued****Facility ID: 1409030092**

Emissions Unit ID: R014

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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 it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. when the 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.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R015 - Finishing Booth - SB5	OAC rule 3745-31-05 (A)(3)	See term A.I.2.a, A.I.2.b, A.I.2.c., A.I.2.e and A.I.2.i. 0.1 lb PM-PM10/ hour 0.44 ton/ year PM-PM10 The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1) and OAC rule 3745-21-09(U)(1)(c).
	OAC rule 3745-17-07 (A)	See Term A.I.2.d.
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-09 (U)(1)(c)	See Term A.I.2.f.
	OAC rule 3745-21-07 (G)	Exempt

2. Additional Terms and Conditions

- 2.a The organic compound emissions from emissions unit R015 shall not exceed 210 pounds per day when coating metal parts.
- 2.b The organic compound emissions from emissions unit R015 shall not exceed 293 pounds per day when coating non-metal parts.

Issued: To be entered upon final issuance

- 2.c** The permittee shall not employ more than 18.0 tons of OC per year in emissions units R011 - R015, combined based upon a rolling 12-month summation of the OC input figures.

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

Month(s)	Maximum Allowable Cumulative Input Rates of OC (in tons)
1	1.5
1-2	3.0
1-3	4.5
1-4	6.0
1-5	7.5
1-6	9.0
1-7	10.5
1-8	12.0
1-9	13.5
1-10	15.0
1-11	16.5
1-12	18.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual OC input limitation shall be based upon a rolling, 12-month summation of the OC input figures.

The OC input figures are equivalent to the OC emission rates and are based upon 100% of the solvent in the coating materials being emitted.

- 2.d** The visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- 2.e** The OC content as applied of each of the coatings employed in this emissions unit shall not exceed 7.3 pounds per gallon for non-metal parts.
- 2.f** The OC content as applied of each of the coatings employed in this emissions unit shall not exceed 3.5 pounds per gallon for metal parts.

Issued: To be entered upon final issuance

- 2.g Compliance with OAC rule 3745-31-05 shall be demonstrated by the usage and emissions limits, use of compliance coatings and compliance with the Ohio EPA Air Toxics policy.
- 2.h The hourly emission limitation outlined in Term A.1. is based upon the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with this limit.
- 2.i The use of photochemically reactive material as defined in OAC rule 3745-21-01 (C)(5) is prohibited (for non-metal parts).

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain monthly records of the following information for emissions units R011 - R015 :
 - a. The name, identification number and type of material coated (metal or non-metal) for each coating, as applied;
 - b. The OC content of each coating, in pounds per gallon, as applied;
 - c. The OC content of each coating, in pounds per gallon (excluding water and exempt solvents), as applied;
 - d. The number of gallons of each coating employed;
 - e. The total OC emissions (input) from all coatings, in pounds (b x d); and,
 - f. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the OC emissions (input) figures for emissions units R011 - R015, combined.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative OC emissions (input) for each calendar month.

Note: The permittee may track the organic compound emissions based on the number of doors produced and use a coating usage factor (gallons of coating used per door

Emissions Unit ID: R015

produced) to calculate the gallons of coating used from the number of doors manufactured. The permittee shall update the factor every six calendar months using actual inventory records if such a factor is used. The calculations used to develop the cumulative organic compound emissions factor shall be maintained on file.

2. The permittee shall collect and record the following information each month:
 - a. The company identification of each liquid organic material employed in this emissions unit; and,
 - b. A record of each liquid organic material employed in this emissions unit indicating, whether or not the liquid organic material is photochemically reactive as identified in OAC rule 3745-21-01(C)(5).

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports for emissions units R011 - R015 which identify all exceedances of the rolling, 12-month OC input limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative OC input levels.
2. The permittee shall submit an annual report for emissions unit R011 - R015 which lists the total OC emissions for the calendar year. This report shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings in emissions units R011 - R015. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
4. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit (for non-metal parts). This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of material(s) emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.
5. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

1. The permittee shall calculate the OC emission rate for each emissions unit by multiplying the OC content by the coating usage rate unless otherwise stated in this permit.

Issued: To be entered upon final issuance

2. Compliance with the rolling, 12-month summation OC emission limits cited in Term A.II.2.c shall be demonstrated by the record keeping in Term A.III.1.
3. USEPA Methods 24 and 24A shall be used to determine the OC contents for the coatings and cleanup materials employed in this emissions unit. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
4. Compliance with the visible particulate limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

114

Pease Industries Incorporated

PTI Application: 14-05064

Issued

Facility ID: 1409030092

Emissions Unit ID: R015

VI. Miscellaneous Requirements

None.

Issued: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R015 - Finishing Booth - SB5	Air Toxics Policy	See Term B.VI.1

2. Additional Terms and Conditions

None.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

None.

IV. Reporting Requirements

None

V. Testing Requirements

None.

VI. Miscellaneous Requirements

- 1. The permit to install for this emissions unit R015 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

Issued: To be entered upon final issuance

"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 Ground-Level Concentration (MAGLC).

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

Pollutant : Toluene

TLV (ug/m3): 188,400

Maximum Hourly Emission Rate (lbs/hr): 17.4

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 478.8

MAGLC (ug/m3): 4485.7

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics 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 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.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes,

Issued: To be entered upon final issuance

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

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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. when the 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.