John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

11/18/2014

Certified Mail

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

Les Siegler
Greenville Technology, Inc.
5755 State Route 571E
Greenville, OH 45331

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0819070190
Permit Number: P0116921
Permit Type: Administrative Modification
County: Darke

Dear Permit Holder:

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

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

How to appeal this permit

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

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

How to save money, reduce pollution and reduce energy consumption

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

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

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

If you have any questions, please contact Regional Air Pollution Control Agency at (937)225-4435 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Erica R. Engel-Ishida, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA
RAPCA; Indiana

FINAL

Division of Air Pollution Control
Permit-to-Install
for
Greenville Technology, Inc.

Facility ID:	0819070190
Permit Number:	P0116921
Permit Type:	Administrative Modification
Issued:	11/18/2014
Effective:	11/18/2014

Division of Air Pollution Control
Permit-to-Install
for
Greenville Technology, Inc.

Table of Contents

Authorization 1
A. Standard Terms and Conditions 3
1. Federally Enforceable Standard Terms and Conditions 4
2. Severability Clause 4
3. General Requirements 4
4. Monitoring and Related Record Keeping and Reporting Requirements 5
5. Scheduled Maintenance/Malfunction Reporting 6
6. Compliance Requirements 6
7. Best Available Technology 7
8. Air Pollution Nuisance 8
9. Reporting Requirements 8
10. Applicability 8
11. Construction of New Sources(s) and Authorization to Install 8
12. Permit-To-Operate Application 9
13. Construction Compliance Certification 10
14. Public Disclosure 10
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations 10
16. Fees 10
17. Permit Transfers 10
18. Risk Management Plans 10
19. Title IV Provisions 10
B. Facility-Wide Terms and Conditions 11
C. Emissions Unit Terms and Conditions 14
1. Emissions Unit Group -Plastic parts coating lines: R001,R002,R003, ... 15

Authorization

Facility ID:	0819070190
Facility Description:	motor vehicle parts and accessories
Application Number(s):	M0002784, M0002785
Permit Number:	P0116921
Permit Description:	Administrative Modification to Permit To Installs 08-04719 for R001 and 08-04727 for R002 and R003 to reduce the emissions limitations and include an alternative ppm emissions limitation for the regenerative thermal oxidizer control system.
Permit Type:	Administrative Modification
Permit Fee:	$300.00
Issue Date:	11/18/2014
Effective Date:	11/18/2014

This document constitutes issuance to:

Greenville Technology, Inc.
5755 State Route 571E
Greenville, OH 45331

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

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

Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280
(937)225-4435

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0116921
Permit Description: Administrative Modification to Permit To Installs 08-04719 for R001 and 08-04727 for R002 and R003 to reduce the emissions limitations and include an alternative ppm emissions limitation for the regenerative thermal oxidizer control system.

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

Group Name: Plastic parts coating lines

Emissions Unit ID:	**R001**
Company Equipment ID:	Coating Line #2
Superseded Permit Number:	08-04719
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**R002**
Company Equipment ID:	New Coating Line #3
Superseded Permit Number:	08-04727
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**R003**
Company Equipment ID:	Coating Line #5
Superseded Permit Number:	08-04727
General Permit Category andType:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A.2.a), Severability Clause

(2) Standard Term and Condition A.3.c) through A. 3.e)General Requirements

(3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements

(4) Standard Term and Condition A.9., Reporting Requirements

(5) Standard Term and Condition A.10., Applicability

(6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install

(7) Standard Term and Condition A.14., Public Disclosure

(8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(9) Standard Term and Condition A.16., Fees

(10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

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

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

c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

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

c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

(1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Regional Air Pollution Control Agency.

(2) Quarterly written reports of (i) any deviations from federally enforceable emissionlimitations, operationalrestrictions, andcontroldeviceoperatingparameterlimitations, 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 Regional Air Pollution Control Agency. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, andreportingrequirements contained in this permit shall be submitted to the Regional Air Pollution Control Agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

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

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

6. Compliance Requirements

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

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

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

b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c) The permittee shall submit progress reports to the Regional Air Pollution Control 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:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

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

8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Regional Air Pollution Control 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 Regional Air Pollution Control 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, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

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

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

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

b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the

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

c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).

d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

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

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

12. Permit-To-Operate Application

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

13. Construction Compliance Certification

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

a) Completion of initial installation date shall be enteredupon completion of construction and prior to start-up.

b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

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

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

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

16. Fees

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

17. Permit Transfers

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

18. Risk Management Plans

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

19. Title IV Provisions

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

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

2. The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 tons/year for any single HAP and 24.9 tons/year for any combination of HAPs, based on rolling, 12-month summations.

3. The permittee shall collect and record the following information each month for all materials containing any hazardous air pollutant (HAP)* that are applied in the facility:

   a) the name and identification number/code of each coating, thinner, additive, cleanup material, and any other material containing any HAP;

   b) the name/identification of each individual HAP contained in each material applied (and identified in a.) and the pound(s) of each HAP per gallon of each HAP-containing material applied;

   c) the number of gallons of each coating, thinner, additive, cleanup material, and other material applied during the month;

   d) for each individual HAP, the total uncontrolled emissions from all the materials employed, in ton(s) [i.e., for each individual HAP, the summation of the products of b. times c. for all the materials applied during the month, divided by 2,000 pounds];

   e) the total uncontrolled combined HAPs emissions from all the materials employed during the month, in ton(s) [i.e., the summation of all the individual HAPs emissions from d.];

   f) for each individual HAP, the calculated, controlled emission rate from all the materials employed, in ton(s) [i.e., the total uncontrolled individual HAP emission rate calculated in d., multiplied by 1 minus the overall control efficiency for the control equipment, as determined during the most recent emissions test that demonstrated the emissions unit was in compliance];

   g) the calculated, controlled combined HAPs emission rate for all the materials employed, in ton(s) [i.e., the uncontrolled total combined HAPs emission rate, calculated in e., multiplied by 1 minus the overall control efficiency for the control equipment, as determined during the most recent emissions test that demonstrated the emissions unit was in compliance];

   h) for each individual HAP, the total emissions during the rolling, 12-month period [i.e., the summation of the individual HAP emissions, as recorded in f., for the present month plus the previous 11 months of operation], in ton(s); and

   i) The total combined HAP emissions during the rolling 12-month period [i.e., the summation of all HAP emissions, as recorded in g., for the present month plus the previous 11 months of operation], in ton(s).

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

4. The permittee shall submit quarterly deviation (excursion) reports that identify the following information:

   a) all exceedances of the rolling, 12-month individual HAP emission limitation for each HAP for all the coatings, thinners, additives, and cleanup materials employed; and

   b) allexceedances of the rolling, 12-month total combined HAPs emission limitation for all the coatings, thinners, additives, and cleanup materials employed.

5. The permittee shall submit annual reports that specify the individual and/or combined HAP emissions from the facility for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including the specific emission data from this facility in the annual Fee Emission Report.

6. Compliance with the emission limitations in B.2 shall be determined in accordance with the following methods:

   a) Emission Limitation:

      9.9 tons for each individual HAP/rolling, 12-month period

      Applicable Compliance Method:

      Compliance with the annual allowable individual HAP emission limitation above shall be based upon the record keeping requirements specified in B.3.

   b) Emission Limitation:

      24.9 tons for all HAPs combined/rolling, 12-month period

      Applicable Compliance Method:

      Compliance with the annual allowable combined HAPs emission limitation above shall be based upon the record keeping requirements specified in B.3.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group -Plastic parts coating lines: R001,R002,R003,

EU ID	Operations, Property and/or Equipment Description
R001	Robotic plastic parts coating line including drying ovens, with a permanent total enclosure, fume concentrator, and regenerative thermal oxidizer. Installed pre August 3rd, 2006.
R002	Robotic plastic parts coating line including drying ovens, with a permanent total enclosure, fume concentrator, and regenerative thermal oxidizer. Installed pre August 3rd, 2006.
R003	Robotic plastic parts coating line including drying ovens, with a permanent total enclosure, fume concentrator, and regenerative thermal oxidizer. Installed pre August 3rd, 2006.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(F) Voluntary limitation to establish an alternative emission limit.	<u>For emissions unit R001:</u> The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 11.25 pounds per hour from coatings and 92.55 tons per year from coatings and cleanup materials. See b)(2)b. <u>For emissions unit R002:</u> The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 26.25 pounds per hour from coatings and 92.55 tons per year from coatings and cleanup materials. See b)(2)b. <u>For emissions unit R003:</u> The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 14.00 pounds per hour from coatings and 92.55 tons per year from

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		coatings and cleanup materials. See b)(2)b. See b)(2)a.
b.	OAC rule 3745-31-05(D) (synthetic minor to avoid PSD)	The VOC emissions from emissions units R001, R002 and R003 shall not exceed 92.55tons per year from coatings and cleanup materials, based upon a rolling, 12-month summation of the monthly emissions.
c.	OAC rule 3745-21-07(M)(2) and OAC rule 3745-21-07(M)(4).	The emissions limitations specified by these rules are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(F).
d.	OAC rule 3745-31-05(A)(3)	The emissions limitations specified by these rules are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(F).

(2) Additional Terms and Conditions

a. The hourly VOC emissions limits were established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this short term emissions limitation.

b. The VOC emissions from emissions units R001, R002 and R003 shall be controlled through the application of a permanent total enclosure with a 100% capture efficiency, a fume concentrator, and a regenerative thermal oxidizer (RTO) system. The fume concentrator and RTO system shall achieve an overall minimum 90% removal/destruction efficiency, or a maximum total outlet concentration of 20 ppm (as propane) by volume on a dry basis, for the RTO and concentrator exhausts.

The permittee has demonstrated the total hourly emissions rate that corresponds to a total outlet concentration of 20 ppm (as propane) is more stringent than the sum of the individual lb/hour emissions limitation specified for each emissions unit.

c. The permanent total enclosure shall be constructed to totally enclose the application stations, coating reservoirs, and all areas from the application station to the oven and the control device, such that all organic compound emissions are captured, contained, and directed to the control device.

d. All of the VOC emissions from the emissions units listed above shall be vented to the thermal oxidizer that shall meet the operational, monitoring, and record keeping requirements of this permit, when one or more of the emissions units are in operation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.013 mm Hg (0.007 in. H2O), whenever the emissions unit is in operation.

(2) The permittee shall measure, document/calculate, and maintain a permanent record of the following information for the permanent total enclosure, which may be the same record documented during the compliance test(s):

a. the measured diameter of each natural draft opening;

b. the distance measured from each natural draft opening to each VOC emitting point;

c. the total calculated surface area of all natural draft openings and the surface area of the enclosures four walls, floor, and ceiling;

d. the calculation or demonstration that the distance from each VOC emitting point to each natural draft opening is at least 4 times the diameter of the opening; and

e. The calculation demonstrating that the sum of the surface areas of all of the natural draft openings to the enclosure is not more than 5 percent of the sum of the surface areas of the enclosures four walls, floor, and ceiling.

(3) The permittee shall install, operate, and maintain monitoring devices and a recorder that continuously monitor and record the differential pressure between the inside and outside of the permanent total enclosure when the emissions unit is in operation. The monitoring and recording devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals, with any modifications deemed necessary by the permittee.

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

a. all three-hour blocks of time during which the difference in pressure between the permanent total enclosure and the surrounding areas is not maintained at or above the minimum pressure differential of 0.007 inches of water, as a three hour average; and

b. A log or record of downtime for the capture (collection) system when the emissions unit was in operation.

(5) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance.

(6) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and

b. A log (date and total time) of the downtime or bypass of the capture (collection) system and thermal oxidizer, and/or downtime of the monitoring equipment, when the associated emissions unit(s) was/were in operation.

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

(7) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average temperature of the desorption air stream to the fume concentrator wheel, for any 3-hour block of time when the emissions unit(s) is/are in operation, shall not be less than the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance.

(8) The number of revolutions per hour (RPH) of the fume concentrator shall be continuously maintained, when the emissions unit is in operation, at a value within +/- 1 RPH (where 10 Hertz (HZ) equals 1 RPH) of the value established during the most recent emission test that demonstrated the emissions unit was in compliance.

(9) The permittee shall perform daily checks, when this emissions unit is in operation, to verify the fume concentrator wheel RPH by way of manually recording the HZ setting (where 10 HZ equals 1 RPH) is at a value within +/-1 RPH of the value established during the most recent compliance test that demonstrated the emissions unit was in compliance. This verification shall be noted in a log book.

(10) The permittee shall perform a manual check of the rotational speed of the fume concentrator wheel at least once per calendar quarter. This check and the determined RPH shall be noted in an operator's log. This quarterly check is preformed to document the RPH and to verify the accuracy of the HZ readings conducted pursuant to d)(9).

(11) The permittee shall collect and record the following information on a monthly basis for the coating and cleanup materials applied in this emissions unit:

a. the name and identification number of each coating, as applied;

b. the VOC content of each coating, as applied, in pounds per gallon;

c. the number of gallons of each coating employed;

d. the total uncontrolled VOC emissions from all coatings employed in pounds [i.e., the summation of the products of (11)b. x (11)c.];

e. the name and identification of each cleanup material employed;

f. the VOC content of each cleanup material, in pounds per gallon;

g. the number of gallons of each cleanup material employed;

h. the total uncontrolled VOC emissions from all cleanup materials employed in pounds [i.e., the summation of the products of (11)f. x (11)g.];

i. the overall control efficiency determined for the fume concentrator and regenerative thermal oxidizer during the most recent demonstration of compliance;

j. the total controlled VOC emissions from all coatings employed in pounds {i.e., (11)d. x [1 - (11)i.]};

k. the total controlled VOC emissions from all cleanup materials employed in pounds {i.e., (11)h. x [1 - (11)i.]}; and

l. The total controlled VOC emissions from all coatings and cleanup materials employed in tons {i.e., [(11)j. + (11)k.] divided by 2000 lbs/ton}.

(12) The permittee shall calculate and maintain monthlyrecords of the VOCemissions and the rolling 12-monthemissions of VOC for emissions units R001, R002 and R003 combined, in tons.

e) Reporting Requirements

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

a. each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizer was outside of the acceptable range;

b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the thermal oxidizer;

c. each incident of deviation described in e)(1)a. or e)(1)b. where a prompt investigation was not conducted;

d. each incident of deviation described in e)(1)a. or e)(1)b. where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken;

e. each incident of deviation described in e)(1)a. or e)(1)b where proper records were not maintained for the investigation and/or the corrective action(s);

f. each day during which the RPH (as determined by the HZ monitoring) of the fume concentrator, when the emissions unit was in operation, did not comply with the requirements established in this permit;

g. each quarter during which the manual check of the actual rotational speed of the fume concentrator (RPH), when the emissions unit was in operation, did not indicate compliance with the value established in d)(8) and/or did not correspond to 1 RPH for every 10 HZ see d)(10) and the corrective actions taken to reestablish the proper rotational speed (RPH) for the fume concentrator;

h. all three hour blocks of time, when the emissions unit was in operation, during which the permanent total enclosure was not maintained at the minimum pressure differential of 0.007 inches of water; and

i. allexceedances of the rolling, 12-month VOC emission limitation of 92.55 tons for emissions units R001, R002 and R003, combined.

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

(2) The permittee shall submit annual reports that identify the total VOC emissions, in tons, for this emissions unit.

The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Title V Fee Emission Report.

f) Testing Requirements

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

a. Emission Limitation:

The VOC emissions from R001, R002 and R003 shall not exceed 11.25 lbs/hr,26.25 lbs/hr and 14.00 lbs/hr from coatings respectively.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum hourly coating usage by the maximum VOC content of any coating employed in these emissions unit. It is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this short term emissions limitation.

b. Emission Limitation:

The VOC emissions shall not exceed 92.55 tons per year from coatings and cleanup materials, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(11) and d)(12).

c. Emission Limitation:

100% capture of VOC emissions by application and using a permanent total enclosure.

Applicable Compliance Method:

Compliance performance testing shall be conducted to demonstrate the compliance with the capture efficiency requirement in accordance with the following requirements:

i. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA Guidelines for Determining Capture Efficiency, dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

ii. During the compliance demonstration of the permanent total enclosure, monitoring devices shall be installed to measure the average facial velocity of the air flow through each natural draft opening.

iii. Method 2 from 40 CFR Part 60, Appendix A shall be conducted to determine the volumetric flow rate of the exhaust stream(s) exiting the permanent total enclosure, corrected to standard conditions. If the

building is being used as the permanent total enclosure, it may be necessary to measure the volumetric flow, corrected to standard conditions, of each gas stream entering the Enclosure through a forced makeup air duct, using Method 2. The facial velocity (FV) shall be calculated using the following equation:

FV= (Qo - Qi) /An

where:

Qo is the sum of the volumetric flow from all gas streams exiting the enclosure through an exhaust duct or hood;

Qi is the sum of the volumetric flow from all gas streams into the enclosure through a forced makeup air duct, and is equal to zero if there is no forced makeup air into the enclosure; and

An is the total area of all natural draft openings in the enclosure.]

iv. If the average facial velocity is measured at greater than 500 feet per minute (9,000 m/hr), the direction of air flow shall be assumed to be inward at all times during the compliance demonstration. If the average facial velocity is measured at less than 500 feet per minute, the continuous inward flow of air shall be verified at least once every 10 minutes for a minimum of 1 hour during the compliance demonstration, either by checking the flow or pressure meter(s) or through the use of streamers, smoke tubes, or tracer gases. All closed access doors and windows that are not considered natural draft openings shall also be checked once during the compliance demonstration for leakage around their perimeters using smoke tubes or tracer gases.

v. The permittee shall also measure and record the following information for the permanent total enclosure and each natural draft opening:

(a) the diameter of each natural draft opening;

(b) the distance measured from each natural draft opening to each VOC emitting point in the process;

(c) the distance measured from each exhaust duct or hood in the enclosure to each natural draft opening;

(d) the total surface area of each natural draft opening and the surface area of the enclosures four walls, floor, and ceiling; and

(e) The ratio of the total surface area (sum) of all natural draft openings to the total surface area of the permanent total enclosure.

d. Emission Limitation:

The fume concentrator and a regenerative thermal oxidizer system shall control the VOC emissions with an overall minimum 90% removal/destruction efficiency, or maximum total outlet concentration of 20 ppm (as propane) by volume on a dry basis.

Applicable Compliance Method:

Compliance performance testing shall be conducted to demonstrate the compliance with the control efficiency requirements in accordance with the following requirements:

i. The testing shall be conducted to demonstrate compliance with an overall minimum 90% removal/destruction efficiency, or the maximum total outlet (concentrator and RTO exhaust) concentration of 20 ppm (as propane) by volume on a dry basis.

ii. The following test method(s) shall be employed to demonstrate compliance with the control efficiency and allowable mass emission rate(s):

(a) Method 25, Method 25A, or Method 18 to demonstrate compliance with the destruction/removal efficiency and the allowable mass emission rates.

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

(b) Method 25A to demonstrate compliance with the ppm concentration limitation.

(2) To ensure compliance with the above-mentioned applicable requirements, the permittee shall conduct, or have conducted, compliance performance testing for this emissions unit in accordance with the following requirements:

a. A compliance test shall be conducted within 90 days after issuance of this permit to determine compliance with:

i. the combined 51.50 lb-VOC/hr (sum of limitations for emissions units R001, R002 and R003);

ii. 100% capture efficiency by application of a permanent total enclosure; and

iii. a maximum total outlet concentration of 20 ppm (as propane) by volume on a dry basis, for the RTO and concentrator exhausts.

The schedule and requirements for subsequent future compliance tests shall follow those specified in the most recent Title V operating permit for the facility.

b. In the event a new emissions control device or system is installed, testing shall be conducted within 180 days after installation of the new control device to;

i. show compliance with the combined 51.50 lb-VOC/hr (sum of limitations for emissions units R001, R002 and R003);

ii. show compliance with 100% capture efficiency by application of a permanent total enclosure;

iii. determine the initial overall removal/destruction efficiency; and

iv. show compliance with the overall minimum removal/destruction efficiency, or maximum total outlet concentration for the RTO and concentrator exhausts, as specified in b)(2)b.

(a) if the permittee decides to use a removal/destruction efficiency to show compliance, rather than showing compliance with the 20 ppm limit, they must meet the overall minimum 90% removal/destruction efficiency as stated in b)(2)b.

c. The compliance performance tests shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

d. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit

and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency. Miscellaneous Requirements

g) Miscellaneous Requirements

(1) None.