



11/25/2014

Vinod Shah  
Continental Structural Plastics  
255 Rex Blvd.  
Auburn Hills, MI 48326

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL

Facility ID: 0388000002  
Permit Number: P0117494  
Permit Type: Initial Installation  
County: Wyandot

Certified Mail

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

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of 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 permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Daily Chief-Union. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall  
Permit Review/Development Section  
Ohio EPA, DAPC  
50 West Town Street, Suite 700  
P.O. Box 1049  
Columbus, Ohio 43216-1049

and Ohio EPA DAPC, Northwest District Office  
347 North Dunbridge Road  
Bowling Green, OH 43402

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461.

Sincerely,

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

Cc: U.S. EPA Region 5 -Via E-Mail Notification  
Ohio EPA-NWDO; Michigan; Canada

PUBLIC NOTICE  
Issuance of Draft Air Pollution Permit-To-Install  
Continental Structural Plastics

Issue Date: 11/25/2014  
Permit Number: P0117494  
Permit Type: Initial Installation  
Permit Description: Initial installation permit for coating operation and curing oven controlled with a thermal oxidizer.  
Facility ID: 0388000002  
Facility Location: Continental Structural Plastics  
2915 County Road 96,  
Carey, OH 43316  
Facility Description: All Other Plastics Product Manufacturing

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Andrea Moore, Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402. Ph: (419)352-8461



**Permit Strategy Write-Up**  
Continental Structural Plastics  
**Permit Number:** P0117494  
**Facility ID:** 0388000002



## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Continental Structural Plastics (CSP -Carey) operates a plastics /composites molding /manufacturing facility in Carey, Ohio.

3. Facility Emissions and Attainment Status:

CSP - Carey is installing a new coating operation (emissions unit R020), with a curing oven, and a Permanent Total Enclosure and a thermal oxidizer. The facility currently has an existing coating operation with an existing thermal oxidizer (R009), and has approximately 36 molding presses. Wyandot County is in attainment (or unclassified) for all criteria pollutants.

4. Source Emissions:

CSP - Carey has requested 38.2 tons per year VOC (31.6 tons per year for coating operations and 6.6 tons per year for clean-up operations) for emissions units R020.

5. Conclusion:

A synthetic minor restriction of 38.2 tons VOC per year total for R020 will effectively limit the potential emissions for this installation and permit action, and for the facility overall, to be less than the Prevention of Significant Deterioration (PSD) major source annual threshold of 250 tons VOC.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

| <u>Pollutant</u> | <u>Tons Per Year</u> |
|------------------|----------------------|
| 38.2             | VOC                  |





**DRAFT**

**Division of Air Pollution Control**  
**Permit-to-Install**  
for  
Continental Structural Plastics

|                |                                   |
|----------------|-----------------------------------|
| Facility ID:   | 0388000002                        |
| Permit Number: | P0117494                          |
| Permit Type:   | Initial Installation              |
| Issued:        | 11/25/2014                        |
| Effective:     | To be entered upon final issuance |





**Division of Air Pollution Control**  
**Permit-to-Install**  
for  
Continental Structural Plastics

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**Draft Permit-to-Install**  
Continental Structural Plastics  
**Permit Number:** P0117494  
**Facility ID:** 0388000002

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

## Authorization

Facility ID: 0388000002  
Facility Description: Finished molded fiberglass reinforced plastic parts.  
Application Number(s): A0051420  
Permit Number: P0117494  
Permit Description: Initial installation permit for coating operation and curing oven controlled with a thermal oxidizer.  
Permit Type: Initial Installation  
Permit Fee: \$200.00 *DO NOT send payment at this time, subject to change before final issuance*  
Issue Date: 11/25/2014  
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Continental Structural Plastics  
2915 County Road 96  
Carey, OH 43316

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

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

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

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



**Draft Permit-to-Install**  
Continental Structural Plastics  
**Permit Number:** P0117494  
**Facility ID:** 0388000002

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

## Authorization (continued)

Permit Number: P0117494  
Permit Description: Initial installation permit for coating operation and curing oven controlled with a thermal oxidizer.

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

|                                   |                      |
|-----------------------------------|----------------------|
| <b>Emissions Unit ID:</b>         | <b>R020</b>          |
| Company Equipment ID:             | Topcoat Paint System |
| Superseded Permit Number:         |                      |
| General Permit Category and Type: | Not Applicable       |



**Draft Permit-to-Install**  
Continental Structural Plastics  
**Permit Number:** P0117494  
**Facility ID:** 0388000002  
**Effective Date:** To be entered upon final issuance

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



## **1. Federally Enforceable Standard Terms and Conditions**

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

## **2. Severability Clause**

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

## **3. General Requirements**

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



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

#### **4. Monitoring and Related Record Keeping and Reporting Requirements**

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



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

## 5. Scheduled Maintenance/Malfunction Reporting

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

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

## 6. Compliance Requirements

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



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

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

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

## **7. Best Available Technology**

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



**8. Air Pollution Nuisance**

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

**9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

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

**10. Applicability**

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

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

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



obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the permittee shows good cause for any such extension.

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

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

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

## **12. Permit-To-Operate Application**

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



**13. Construction Compliance Certification**

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

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

**14. Public Disclosure**

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

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

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

**16. Fees**

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

**17. Permit Transfers**

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

**18. Risk Management Plans**

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

**19. Title IV Provisions**



**Draft Permit-to-Install**  
Continental Structural Plastics  
**Permit Number:** P0117494  
**Facility ID:** 0388000002

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

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**



**Draft Permit-to-Install**  
Continental Structural Plastics  
**Permit Number:** P0117494  
**Facility ID:** 0388000002

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

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.



**Draft Permit-to-Install**  
Continental Structural Plastics  
**Permit Number:** P0117494  
**Facility ID:** 0388000002  
**Effective Date:** To be entered upon final issuance

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



**1. R020, Topcoat Paint System**

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

Topcoat Paint System that includes a CO2 booth for parts cleaning, base coat, clear coat and a bake oven with a regenerative thermal oxidizer (RTO).

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. | 40 CFR Part 63, Subpart PPPP (40 CFR 63.4480 et seq.)<br><br>[In accordance with 40 CFR 63.4482, this emissions unit is a new coating operation at an 'existing plastic parts coating operation' subject to the emissions limitations /control measures specified in Subpart PPPP.] | general use coating category [63.4490(b)(1)]:<br>0.16 kg (0.16 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period<br><br>See b)(2)a, b)(2)b, and b)(2)c.   |
| b. | 40 CFR 63.1-15 [40 CFR 63.4501]   | Table 2 to Subpart PPPP of 40 CFR Part 63 – Applicability of General Provisions to Subpart PPPP shows which parts of the General Provisions in 40 CFR 63.1-15 apply.   |
| c. | OAC rule 3745-31-05(D)  | <u>Coating Operations:</u><br>8.76 pounds volatile organic compounds (VOC) per hour<br><br>38.4 tons VOC per rolling, 12-month period<br><br><u>Clean-up Operations:</u><br>1100 pounds VOC per month<br><br>6.60 tons VOC per rolling, 12-month |



|    | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|-------------------------------|---|
|    |                               | period  |
|    |                               | See b)(2)e.                                       |
| d. | ORC 3704.03(T)                | See b)(2)d.                                       |
| e. | OAC rule 3745-17-11(C)        | See c)(6) and c)(7).                              |
| f. | OAC rule 3745-21-07(M)(4)     | See b)(2)f.                                       |

(2) Additional Terms and Conditions

- a. The affected source is the collection of all of the following items that are used for surface coating of plastic parts and products within each category.
  - i. All coating operations as defined in 40 CFR 63.4581;
  - ii. All storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
  - iii. All manual and automated equipment and containers used for conveying coatings, thinners and/or other additives, and cleaning materials; and
  - iv. All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.  
[40 CFR 63.4482(b)]
- b. Emission rate with add-on controls option.

The permittee must demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operation(s), and the emissions reductions achieved by emission capture systems and add-on controls, the organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emission limit in 40 CFR 63.4490, calculated as a rolling 12-month emission rate and determined on a monthly basis. If/when using this compliance option, the permittee must also demonstrate that all emission capture systems and add-on control devices for the coating operation(s) meet the operating limits required in 40 CFR 63.4492 and that the work practice standards required in 40 CFR 63.4493 are met. The permittee must meet all the requirements of 40 CFR 63.4560 through 63.4568 to demonstrate compliance with the emission limits, operating limits, and work practice standards using this option. (see also 40 CFR 63.4542 - Continuous Compliance specifications)

The permittee has initially indicated that the General Use coating emissions standard category [i.e. 63.4490(b)(1)] will be used. The permittee may use any of the four coating categories [63.4490(b)(1), (2), (3), or (4)]; however, the permittee must meet the category definition and standard, and all applicable requirements, when each is used.



The permittee has initially indicated that the Emission Rate with Add-on Controls option [i.e. 63.4491(c)] will be used. The permittee may use any of the three compliance options [63.4491(a), (b), or (c)]; however, the permittee must meet all of the stated requirements of each option when it is used.  
[40 CFR 63.4491(c)]

- c. Any coating operation(s) for which the emission rate with add-on controls option is used, the permittee must be in compliance with the emission limitations in accordance with the following:
  - i. The coating operation(s) must be in compliance with the applicable emission limit in 40 CFR 63.4490 at all times except during periods of startup, shutdown, and malfunction.
  - ii. The coating operation(s) must be in compliance with the operating limits for emission capture systems and add-on control devices required by 40 CFR 63.4492 at all times except during periods of startup, shutdown, and malfunction.
  - iii. The coating operation(s) must be in compliance with the work practice standards in 40 CFR 63.4493 at all times.  
[40 CFR 63.4500(a)(2)]
- d. Best Available Technology (BAT) requirements for VOC emissions for this emissions unit have been determined to be equivalent to 40 CFR Part 63 Subpart PPPP.
- e. This permit establishes the following federally enforceable emission limitations for the purpose of limiting Potential to Emit. The federally enforceable emission limitations are based on the operational restriction contained in c)(5) which require control equipment:
  - i. 8.76 pounds VOC per hour, for coating operations
  - ii. 31.6 tons VOC per rolling, 12-month period, for coating operations
  - iii. 1100 pounds VOC per month, for clean-up operations
  - iv. 6.60 tons VOC per rolling, 12-month period, for clean-up operations
- f. This emissions unit includes a curing oven as defined /specified under OAC 3745-21-07(M)(4), and is a new source for which installation commenced prior to the effective date of this rule. Therefore, this emissions unit is not subject to this rule.
- g. Combustion emissions from the curing oven and the oxidizer have been determined to be negligible, and will therefore not be addressed in this permit.



c) Operational Restrictions

(1) The permittee must always operate and maintain the affected source, including all air pollution control and monitoring equipment used for purposes of complying with Subpart PPPP, according to the provisions in 40 CFR 63.6(e)(1)(i).  
[40 CFR 63.4500(b)]

(2) If the affected source uses an emission capture system and add-on control device, the permittee must develop a written Startup, Shutdown, and Malfunction Plan (SSMP) according to the provisions in 40 CFR 63.6(e)(3). The plan must address the startup, shutdown, and corrective actions in the event of a malfunction of the emission capture system or the add-on control device. The plan must also address any coating operation equipment that may cause increased emissions or that would affect capture efficiency if the process equipment malfunctions, such as conveyors that move parts among enclosures.  
[40 CFR 63.4500(c)]

(3) When using the emission rate with add-on controls option, the permittee must meet the operating limits specified in Table 1 to Subpart PPPP. The permittee must meet the operating limits at all times after they have been established.

If using an add-on control device other than those listed in Table 1, or wishing to monitor an alternative parameter and comply with a different operating limit, the permittee must apply to the US EPA Administrator for approval of alternative monitoring under 40 CFR 63.8(f).

[40 CFR 63.4492(b) and (c)]

(4) If the permittee uses the emission rate with add-on controls option, you must develop and implement a work practice plan to minimize organic HAP emissions from the storage, mixing, and conveying of coatings, thinners and/or other additives, and cleaning materials used in, and waste materials generated by the controlled coating operation(s) for which you use this option; or you must meet an alternative standard as provided in 40 CFR 63.4493(c). The plan must specify practices and procedures to ensure that, at a minimum, the following elements are implemented.

a. All organic-HAP-containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be stored in closed containers.

b. Spills of organic-HAP-containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be minimized.

c. Organic-HAP-containing coatings, thinners and/or other additives, cleaning materials, and waste materials must be conveyed from one location to another in closed containers or pipes.

d. Mixing vessels which contain organic-HAP-containing coatings and other materials must be closed except when adding to, removing, or mixing the contents.



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- e. Emissions of organic HAP must be minimized during cleaning of storage, mixing, and conveying equipment.  
 [40 CFR 63.4492(b) and (c)]
- (5) The following operational restriction(s) have been included in this permit for the purpose of establishing federally enforceable requirements which limit Potential to Emit [see b)(2)e.]:
  - a. this emissions unit shall be equipped with a Permanent Total Enclosure (PTE) designed and operated to achieve 100 percent capture; and
  - b. this emissions unit shall be equipped with a thermal oxidizer designed and operated to achieve a 97 percent destruction efficiency for volatile organic compounds.
- (6) The permittee shall install and operate a water wash/curtain system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the system in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (7) In the event the water wash/curtain system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.
- d) **Monitoring and/or Recordkeeping Requirements**
  - (1) The permittee shall comply with the applicable monitoring / record keeping requirements required under 40 CFR 63 Subpart PPPP, including the following sections:

|               |  |
|---------------|--|
| 63.4530       | Failure to collect and keep records under 63.4530 is a deviation from the applicable standard.   |
| 63.4530(a)    | maintain records of: A copy of each notification and report that you submitted to comply with Subpart PPPP, and the documentation supporting each notification and report. also, records provisions for predominant activity alternative under 63.4490(c) and facility-specific emission limit alternative under 40 CFR 63.4490(c) |
| 63.4530(b)    | records requirements pertaining to the coating material properties /specifications such as density, organic HAP, solids content  |
| 63.4530(c)(1) | records of the coating operations, compliance option used and the time periods (beginning and ending dates and times) for each option used, for each compliance period   |
| 63.4530(c)(2) | for the compliant material option, a record of the calculation of the organic HAP content for each coating, using Equation 1 of 63.4541, for each compliance period  |



|                  |   |
|------------------|---|
| 63.4530(c)(3)    | record-keeping requirements for the emission rate without add-on controls option, for each compliance period  |
| 63.4530(c)(4)    | record-keeping requirements for the emission rate with add-on controls option, for each compliance period   |
| 63.4530(d)       | record the name and mass of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If using the compliant material option for all coatings at the source, may maintain purchase records for each material used rather than a record of the mass used. |
| 63.4530(e)       | record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period  |
| 63.4530(f)       | record of the mass fraction of coating solids for each coating used during each compliance period   |
| 63.4530(g)       | provisions for an allowance in Equation 1 of 40 CFR 63.4551 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to 63.4551(e)   |
| 63.4530(h)       | must keep records of the date, time, and duration of each deviation   |
| 63.4530(i)       | If/when using the emission rate with add-on controls option, you must keep the records specified in 63.4530(i)(1) through (8)   |
| 63.4530(i)(1)    | For each deviation, a record of whether the deviation occurred during a period of startup, shutdown, or malfunction.  |
| 63.4530(i)(2)    | records in 40 CFR 63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction.  |
| 63.4530(i)(3)    | records (as applicable) required to show continuous compliance with each operating limit specified in Table 1 to Subpart PPPP   |
| 63.4530(i)(4)    | for each capture system that has a PTE determination, records requirements for the support data and documentation   |
| 63.4530(i)(5)    | for each capture system that is not a PTE, the data and documentation you used to determine capture efficiency, including records specified in 63.4530(i)(5)(i) through (iii)   |
| 63.4530(i)(6)    | records for each add-on control device organic HAP destruction or removal efficiency determination as specified in 63.4566  |
| 63.4530(i)(6)(i) | records of each add-on control device performance test conducted  |



|                   |   |
|-------------------|---|
|                   | according to 40 CFR 63.4564 and 63.4566   |
| 63.4530(i)(6)(ii) | records of the coating operation conditions during the add-on control device performance test showing that the performance test was conducted under representative operating conditions   |
| 63.4530(i)(7)     | records of the data and calculations used to establish the emission capture and add-on control device operating limits  |
| 63.4530(i)(8)     | a record of the work practice plan required by 63.4493 and documentation that the plan is being implemented on a continuous basis   |
| 63.4531           | records must be in a form suitable and readily available for expeditious review, according to 40 CFR 63.10(b)(1). may be maintained electronically - 5 years records retention - keep on-site for at least 2 years according to 40 CFR 63.10(b)(1); may keep records off-site for remaining 3 years |

- (2) The permittee shall comply with the applicable specifications / monitoring requirements required under 40 CFR 63 Subpart P, including the following sections:

|               |   |
|---------------|---|
| 63.4568(a)(1) | Continuous Parametric Monitoring System (CPMS) must complete a minimum of one cycle for each 15-minute period - must have a minimum of four equally spaced successive cycles in 1 hour.   |
| 63.4568(a)(2) | CPMS - must determine the average of all recorded readings for each 3-hour (block) period of the capture system and control device operation  |
| 63.4568(a)(3) | CPMS - must record the results of each inspection, calibration, and validation check  |
| 63.4568(a)(4) | CPMS - must maintain the CPMS at all times and have available necessary parts for routine repairs of the monitoring equipment   |
| 63.4568(a)(5) | CPMS - must operate at all times that a controlled coating operation is operating, except during monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, if applicable, calibration checks and required zero and span adjustments). |
| 63.4568(a)(6) | CPMS - must not use capture system or control device data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or required quality assurance or control activities - must use all the data collected during all other periods                             |



|                    |  |
|--------------------|--|
| 63.4568(a)(7)      | CPMS - monitoring malfunction: sudden, infrequent, not reasonably preventable failure of the CPMS - poor maintenance or careless operation not malfunctions - any 'out-of-control' period with no valid data is a deviation from the monitoring requirements   |
| 63.4568(c)(1)      | For a thermal oxidizer, install a gas temperature monitor in the firebox of the thermal oxidizer or in the duct immediately downstream of the firebox before any substantial heat exchange occurs.   |
| 63.4568(c)(2)      | For a catalytic oxidizer, install gas temperature monitors upstream and/or downstream of the catalyst bed as required in 40 CFR 63.3967(b).  |
| 63.4568(c)(3)(i)   | Locate the temperature sensor in a position that provides a representative temperature.  |
| 63.4568(c)(3)(ii)  | Use a temperature sensor with a measurement sensitivity of 5 degrees Fahrenheit or 1.0 percent of the temperature value, whichever is larger.  |
| 63.4568(c)(3)(iii) | Before using the sensor for the first time or when relocating or replacing the sensor, perform a validation check /calibration check.  |
| 63.4568(c)(3)(iv)  | Conduct an accuracy audit every quarter and after every deviation.   |
| 63.4568(c)(3)(v)   | Conduct a visual inspection of each sensor every quarter if redundant temperature sensors are not used.  |
| 63.4568(f)(1)      | Concentrators (if applicable): must install a temperature monitor in the desorption gas stream - must meet the requirements in 63.4568(a) and (c)(3)   |
| 63.4568(f)(2)      | Concentrators (if applicable): must install a device to monitor pressure drop across the zeolite wheel or rotary carbon bed - must meet the requirements in 63.4568(a) and (g)(2)  |
| 63.4568(g)(1)      | Emission capture systems - flow measurement (if applicable): initial requirements, accuracy audit every quarter and after every deviation, leak checks monthly, visual inspections of sensor system quarterly - perform a validation check before initial use or upon relocation or replacement of a sensor              |
| 63.4568(g)(2)      | Emission capture systems - pressure drop measurement (if applicable): initial requirements, accuracy audits every quarter and after every deviation, monthly leak checks, visual inspection of the sensor at least monthly - perform a validation check before initial use or upon relocation or replacement of a sensor |



|                    |  |
|--------------------|--|
| 63.4568(b),(d),(e) | requirements for Capture system bypass line, Regenerative carbon adsorbers, Condensers (if applicable) |
|--------------------|--|

- (3) The permittee shall collect and record the following information each month for all coatings employed in this emissions unit:
  - a. the name and identification number of each coating employed;
  - b. the VOC content of each coating, as applied, in pounds per gallon;
  - c. the number of gallons of each coating employed;
  - d. the (uncontrolled) VOC emission rate for each coating [d)(3)b x d)(3)c], in pounds;
  - e. the total VOC emission rate for all coatings [summation of d)(3)d x 0.03 reduction efficiency], in pounds or tons; and
  - f. the rolling 12-month VOC emission rate for coatings[rolling 12-month total of d)(3)e, in tons].
  
- (4) The permittee shall collect and record the following information each month for all clean-up materials employed in this emissions unit:
  - a. the name and identification number of each cleanup material employed;
  - b. the VOC content of each cleanup material, as applied, in pounds per gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the (uncontrolled) VOC emission rate for each cleanup material [d)(4)b x d)(4)c], in pounds;
  - e. the total VOC emission rate for all cleanup materials [summation of d)(4)d x 0.03 reduction efficiency], in pounds or tons; and
  - f. the rolling 12-month VOC emission rate for cleanup materials [rolling 12-month total of d)(4)e, in tons].

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

$$\text{OC emissions from cleanup operations} = (\text{total gallons of cleanup material used} \times \text{solvent density of cleanup material}) - (\text{total gallons cleanup material sent off-site for disposal or reclamation} [\text{minus solids content of said material}]) \times \text{solvent density}$$



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- (5) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the water wash/curtain system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (6) The permittee shall conduct periodic inspections of the water wash/curtain system to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (7) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the water wash/curtain system while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (8) The permittee shall document each inspection (periodic and annual) of the water wash/curtain system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

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

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

e) Reporting Requirements

- (1) The permittee shall comply with the applicable notification /reporting requirements required under 40 CFR 63 Subpart PPPP, including the following sections:

|         |                           |
|---------|---------------------------|
| 63.4510 | Notification Requirements |
|---------|---------------------------|



|            |   |
|------------|---|
| 63.4520    | Reporting Requirements  |
| 63.4563(f) | Semiannual compliance report, as required in 40 CFR 63.4520: must identify where used the emission rate with add-on controls option; if no deviations from emission limitations, statement that were in compliance with the emission limitations during reporting period because: organic HAP emission rate less than or equal to emission limit, and achieved operating limits and work practice standards, during each compliance period. * |

\* Note: 40 CFR 63 Subpart PPPP requires semiannual reports for the monitoring and record keeping requirements for the capture system and control device, whereas this permit requires quarterly reporting. Therefore, the quarterly reports will satisfy the semiannual reporting requirements for 40 CFR 63 Subpart PPPP.

- (2) 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 range specified by the manufacturer and/or outside of the acceptable range following any required compliance demonstration;
  - 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)(2)a or e)(2)b where a prompt investigation was not conducted;
  - d. each incident of deviation described in e)(2)a or e)(2)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; and
  - e. each incident of deviation described in e)(2)a or e)(2)b where proper records were not maintained for the investigation and/or the corrective action(s).

[OAC 3745-31-05(D)]
- (3) The permittee shall submit quarterly deviation (excursion) reports that identify:
  - a. all deviations (excursions) of the following emission limitations that restrict the Potential to Emit of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. 38.4 tons VOC per rolling, 12-month period, for coating;
    - ii. 6.60 tons VOC per rolling, 12-month period;



- iii. 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
- iv. any daily record showing that the water wash/curtain system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation;
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

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

f) Testing Requirements

- (1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted no later than 180 days after the compliance date. The reported results must be submitted by 180 days after compliance date. Testing timeframe(s) specified may be amended or waived for cause upon prior request of, and written approval of, the U.S. EPA.
  - b. The emission testing shall be conducted:
    - i. to demonstrate /determinedestruction efficiency under 40 CFR, Part 63, Subpart PPPP (for 'organic HAP');
    - ii. to demonstrate compliance with the 97 percent destruction efficiency requirement under OAC 3745-31-05(D) (for VOC);
    - iii. to demonstrate compliance with the lb/hr emission limitation (for coatings) under OAC 3745-31-05(D) (for VOC); and
    - iv. to demonstrate compliance with the 100 percent VOC /HAP capture for Permanent Total Enclosure under Subpart PPPP and OAC 3745-31-05(D).
  - c. The following test method(s) shall be employed to meet the testing requirements above:
    - i. the methods as applicable under 40 CFR 63.4566, for Subpart PPPP destruction efficiency;



- ii. 40 CFR Part 60, Appendix A, Methods 1 through 4, and 18, 25, and/or 25A, as applicable, for OAC 3745-31-05(D) destruction efficiency and lb VOC /hr;
  - iii. the methods as applicable under 40 CFR 63.4565(a), for PTE.
- d. The test(s) shall be conducted at a Maximum Source Operating Rate (MSOR), unless otherwise specified or approved by the Northwest District Office. MSOR is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it 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 at the MSOR is justification for not accepting the test results as a demonstration of compliance.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Northwest District Office. 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 Northwest District Office's refusal to accept the results of the emission test(s).
- f. Personnel from the Northwest District Office 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.
- g. 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 Northwest District Office 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 Northwest District Office.
- (2) 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:  
0.16 kg (0.16 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period  
  
Applicable Compliance Method:  
Compliance shall be based on the requirements as specified in b)(2)b, g)(3), and g)(4).
  - b. Emission Limitation:  
8.76 lbs VOC /hr, for coating operations



Applicable Compliance Method:

The hourly allowable VOC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rates by the maximum VOC content of the coating (as thinned /reduced):

- Black BC (Topcoat) - 11 gallons /hr (5.52 lbs VOC /gallon);
- White BC (Topcoat) - 11 gallons /hr (5.06 lbs VOC /gallon);
- Billet Metallic BC (Topcoat) - 11 gallons /hr (5.78 lbs VOC /gallon);
- Clearcoat - 19.5 gallons /hr (4.61 lbs VOC /gallon); and
- Catalyst - 6.25 gallons /hr (3.57 lbs VOC /gallon),

and multiplied by the 97 percent destruction efficiency factor for the oxidizer (0.03).

Note: These are conservative projections, if all the coatings are used at their maximum projected rates at the same time, in the two coating booths

Compliance shall be based on the emissions testing requirements as specified in f)(1).

- c. Emission Limitation:  
38.4 tons VOC per rolling 12-month period, for coating operations

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements as specified in d)(3).

- d. Emission Limitation:  
1100 lbs VOC /month, for clean-up operations

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements as specified in d)(4).

- e. Emission Limitation:  
6.60 tons VOC per rolling 12-month period, for clean-up operations

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements as specified in d)(4).

- f. Emission Limitation:  
97 percent destruction efficiency, for volatile organic compounds

Applicable Compliance Method:

Compliance shall be based on the emissions testing requirements as specified in f)(1).

- g. Emission Limitation:  
100 percent capture efficiency



Applicable Compliance Method:

Compliance shall be based on the emissions testing requirements as specified in f)(1).

- (3) The permittee shall comply with the applicable testing /compliance requirements required under 40 CFR 63 Subpart PPPP, including the following sections:

|            |  |
|------------|--|
| 63.4561(b) | must establish and demonstrate continuous compliance during the initial compliance period with the operating limits required by 63.4492, using the procedures specified in 63.4567 and 63.4568   |
| 63.4561(c) | must develop, implement, and document implementation of the work practice plan required by 63.4493 during the initial compliance period, as specified in 63.4530   |
| 63.4561(d) | must follow the procedures in 63.4561(e) through (n) to demonstrate compliance with the applicable emission limit in 63.4490 for each affected source in each coating standard category.   |
| 63.4561(e) | follow the procedures specified in 63.4551(a) through (d) to determine the mass fraction of organic HAP, density, and volume of each coating, thinner and/or other additive, and cleaning material used each month; and the mass fraction of coating solids for each coating each month                              |
| 63.4561(f) | in the coating operation or group of coating operations included in the emission rate with add-on controls option: using Equation 1 of 63.4551, calculate the total mass of organic HAP emissions before add-on controls from all coatings, thinners and/or other additives, and cleaning materials used each month, |
| 63.4561(g) | determine the mass of organic HAP emissions reduced for each controlled coating operation during each month - use the procedures in 63.4561(h),  |
| 63.4561(k) | determine the total mass of coating solids used, kg, which is the combined mass of coating solids for all the coatings used during each month, using Equation 2 of 63.4551,  |
| 63.4561(l) | determine the mass of organic HAP emissions, kg, during each month, using Equation 4 of this section 63.4561(l),   |
| 63.4561(m) | determine the organic HAP emission rate for the compliance period, kg (lb) of organic HAP emitted per kg (lb) coating solids used, using Equation 5 of this section 63.4561(m)   |
| 63.4561(n) | Compliance demonstration (overall /summary requirements) - including records, Notification of Compliance status requirements   |



|               |  |
|---------------|--|
| 63.4563(a)    | continuous compliance: the organic HAP emission rate for each compliance period (rolling 12-month) must be equal to or less than the applicable emission limit   |
| 63.4563(b)    | If emission rate exceeded the applicable emission limit, this is a deviation from the emission limitation for that compliance period that must be reported as specified in 63.4510(c)(6) and 63.4520(a)(7).  |
| 63.4563(c)(1) | continuous compliance: with each applicable operating limit (Table 1) when the coating line is in operation - operating parameter out of the allowed range is a deviation from the operating limit that must be reported as specified in 63.4510(c)(6) and 63.4520(a)(7) |
| 63.4563(c)(2) | If operating parameter deviation, must assume that the emission capture system and add-on control device were achieving zero efficiency, unless other data indicating the actual efficiency is approved by the Director.   |
| 63.4563(d)    | must meet the requirements for bypass lines in §63.4568(b) for controlled coating operations - deviation reporting requirements, compliance calculation adjustment requirements  |
| 63.4563(e)    | continuous compliance: with the work practice standards in 63.4493 - plan not developed or implemented, or no required records, is a deviation from the work practice standards that must be reported as specified in 63.4510(c)(6) and 63.4520(a)(7).                   |

g) **Miscellaneous Requirements**

- (1) All emission capture systems, add-on control devices, and CPMS (for this emissions unit) must be installed and operating no later than 180 days after the applicable compliance date specified in 63.4483 (for 'new sources'). Performance tests must be done according to 63.4564, 63.4565, and 63.4566 and operating limits done according to 63.4492 no later than 180 days after the compliance date.  
[40 CFR 63.4560(b)(1)]
- (2) The permittee must develop and begin implementing the work practice plan required by 63.4493 no later than the compliance date (for 'new sources').  
[40 CFR 63.4560(b)(2)]
- (3) The permittee must complete the initial compliance demonstration for the initial compliance period according to the requirements of 40 CFR 63.4561. The initial compliance period begins on the applicable compliance date specified in 40 CFR 63.4483 and ends on the last day of the 12th month following the compliance date. If the compliance date occurs on any day other than the first day of a month, then the initial compliance period extends through the end of that month plus the next 12 months. The permittee must determine the mass of organic HAP emissions and mass of coatings



solids used each month and then calculate an organic HAP emission rate at the end of the initial compliance period.

The initial compliance demonstration includes the results of emission capture system and add-on control device performance tests conducted according to 40 CFR 63.4564, 63.4565, and 63.4566; calculations according to 40 CFR 63.4561 and supporting documentation showing that during the initial compliance period the organic HAP emission rate was equal to or less than the applicable emission limit in 40 CFR 63.4490; the operating limits established during the performance tests and the results of the continuous parameter monitoring required by 40 CFR 63.4568; and documentation of whether you developed and implemented the work practice plan required by 40 CFR 63.4493.

[40 CFR 63.4560(b)(3)]

- (4) The emission rate with add-on controls option may be used for any coating operation, for any group of coating operations in the affected source (i.e. at this facility), or for all of the coating operations in the affected source. Both controlled and uncontrolled coating operations may be included in any such group, but for any coating operation not included, each such operation must use either the compliant material option or the emission rate without add-on controls option. To demonstrate initial compliance, the coating operation(s) for which you use the emission rate with add-on controls option must meet the applicable emission limitations in 40 CFR 63.4490, 63.4492, and 63.4493. You must conduct a separate initial compliance demonstration for each coating standard category.

It is not necessary to re-determine the mass of organic HAP in coatings, thinners and/or other additives, or cleaning materials that have been reclaimed onsite (or reclaimed off-site if documentation shows that the exact same materials that were sent off-site are received back) and reused in the coatings operation(s) included in the emission rate with add-on controls option. If using coatings, thinners and/or other additives, or cleaning materials that have been reclaimed on-site, the amount of each used in a month may be reduced by the amount of each that is reclaimed. That is, the amount used may be calculated as the amount consumed, to account for materials that are reclaimed.

[40 CFR 63.4561(a)]