



12/17/2014

Travis Cobb  
PPG - North Plant  
4829 Fairland Rd  
Barberton, OH 44203

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 1677020163  
Permit Number: P0117866  
Permit Type: Initial Installation  
County: Summit

Certified Mail

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

Dear Permit Holder:

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

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

**How to appeal this permit**

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

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

## **How to save money, reduce pollution and reduce energy consumption**

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

## **How to give us feedback on your permitting experience**

Please complete a survey at [www.epa.ohio.gov/survey.aspx](http://www.epa.ohio.gov/survey.aspx) and give us feedback on your permitting experience. We value your opinion.

## **How to get an electronic copy of your permit**

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

If you have any questions, please contact Akron Regional Air Quality Management District at (330)3752480 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  
ARAQMD; Pennsylvania; West Virginia; Canada



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install  
for  
PPG - North Plant**

Facility ID:	1677020163
Permit Number:	P0117866
Permit Type:	Initial Installation
Issued:	12/17/2014
Effective:	12/17/2014





**Division of Air Pollution Control**  
**Permit-to-Install**  
for  
PPG - North Plant

**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 .....	15
1. Emissions Unit Group -Spray Paint Booths: K001,R003,R004,R006,R007,R008, .....	16





**Final Permit-to-Install**  
PPG - North Plant  
**Permit Number:** P0117866  
**Facility ID:** 1677020163  
**Effective Date:** 12/17/2014

## Authorization

Facility ID: 1677020163  
Facility Description: Chemical and Plastic Sheet Production  
Application Number(s): A0051969  
Permit Number: P0117866  
Permit Description: Initial installation of OLED Process Unit - Cell II  
Permit Type: Initial Installation  
Permit Fee: \$200.00  
Issue Date: 12/17/2014  
Effective Date: 12/17/2014

This document constitutes issuance to:

PPG - North Plant  
PPG Industries, Inc.  
4829 Fairland Road  
Barberton, OH 44203-3913

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

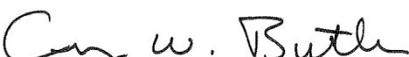
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Akron Regional Air Quality Management District  
146 South High Street, Room 904  
Akron, OH 44308  
(330)375-2480

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Craig W. Butler  
Director



**Final Permit-to-Install**  
PPG - North Plant  
**Permit Number:** P0117866  
**Facility ID:** 1677020163  
**Effective Date:** 12/17/2014

## Authorization (continued)

Permit Number: P0117866

Permit Description: Initial installation of OLED Process Unit - Cell II

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>P071</b>
Company Equipment ID:	P071
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install**  
PPG - North Plant  
**Permit Number:** P0117866  
**Facility ID:** 1677020163  
**Effective Date:** 12/17/2014

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



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

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

## **2. Severability Clause**

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

## **3. General Requirements**

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



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

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

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



- (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 Akron Regional Air Quality Management District. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
  - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the Akron Regional Air Quality Management District 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 Akron Regional Air Quality Management District 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 Akron Regional Air Quality Management District 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 Akron Regional Air Quality Management District.
- 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 Akron Regional Air Quality Management District. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

**10. Applicability**

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

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

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



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

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

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

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

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

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



**13. Construction Compliance Certification**

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

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

**14. Public Disclosure**

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

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

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

**16. Fees**

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

**17. Permit Transfers**

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

**18. Risk Management Plans**

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

**19. Title IV Provisions**

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



**Final Permit-to-Install**  
PPG - North Plant  
**Permit Number:** P0117866  
**Facility ID:** 1677020163  
**Effective Date:** 12/17/2014

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



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) 2, 3, 4 and 5.
2. The emissions of volatile organic compounds (VOC) from emissions units K001, R003, R004, R006, R007 and R008, combined, shall not exceed 9.95 tons per year based upon a rolling, 12-month summation of the monthly VOC emission rates.
3. In order to demonstrate compliance with the emission limitation in 2. above, the permittee shall collect and record the following information each month for emissions units K001, R003, R004, R006, R007 and R008, combined:
  - a) the name and identification number of each coating and coating additive (i.e., activator, accelerator, catalyst, curing agent, thinner, etc.) employed;
  - b) the VOC content of each coating and coating additive, in pounds per gallon or weight fraction;
  - c) the number of gallons or pounds of each coating and coating additive employed;
  - d) the name and identification of each cleanup material employed;
  - e) the VOC content of each cleanup material, in pounds per gallon or weight fraction;
  - f) the number of gallons or pounds of each cleanup material employed;
  - g) the total VOC, in tons, from all the coatings, coating additives and cleanup materials employed; and
  - h) the total VOC emissions during the rolling, 12-month period, i.e., the summation of all VOC emissions as recorded in "g" above, for the present month plus the previous 11 months, in ton(s).
4. The permittee shall submit quarterly deviation (excursion) reports that identify:
  - a) all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:



- (1) all exceedances of the rolling, 12-month emission limitation for VOC, for emissions units K001, R003, R004, R006, R007 and R008, combined.
- b) the probable cause of each deviation (excursion);
- c) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d) the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

5. Compliance with the emission limitation specified in 2. above shall be determined in accordance with the following method(s):

- a) Emission Limitation:

The emissions of VOC from emissions units K001, R003, R004, R006, R007 and R008, combined, shall not exceed 9.95 tons per year based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be demonstrated through the record keeping requirements established in 3 above.

6. All organic hazardous air pollutants (HAPs) are VOCs. Also, the potential to emit of any metal HAP (chromium) is below 10 tons per year (0.18 ton/yr)<sup>1</sup>. Furthermore, the potential to emit for combined HAPs is below 25 tons per year.<sup>2</sup>

<sup>1</sup> The potential to emit for metal HAPs is based on multiplying a maximum chromium content of 0.35 lb/gallon of primer by (1-0.98\*) and by a maximum annual primer usage of 52,568 gallons/year<sup>3</sup>, and then dividing by 2000 lbs/ton.

\* Dry filter control efficiency is considered 98%, by weight.

<sup>2</sup> The potential to emit for the combined HAPs will be 10.13 ton/yr (9.95 + 0.18).

<sup>3</sup> Based on a maximum primer usage of 1 gallon/hr and 8760 hours of operation per year for each of the six spray booths.

7. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63 Subpart HHHHHH, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. Although Ohio EPA has



**Final Permit-to-Install**  
PPG - North Plant  
**Permit Number:** P0117866  
**Facility ID:** 1677020163  
**Effective Date:** 12/17/2014

determined that this Generally Available Control Technology NESHAP (GACT) applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised, that all requirements associated with this rule are in effect and shall be enforced by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>.



**Final Permit-to-Install**  
PPG - North Plant  
**Permit Number:** P0117866  
**Facility ID:** 1677020163  
**Effective Date:** 12/17/2014

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



**1. Emissions Unit Group -Spray Paint Booths: K001,R003,R004,R006,R007,R008,**

EU ID	Operations, Property and/or Equipment Description
K001	Garmat 3000 Paint Spray Booth #7
R003	Devilbiss Model DSFY-9426-34-06 Paint Spray Booth #1
R004	Devilbiss Model SDS-8225 Paint Spray Booth #2
R006	Plastic Parts Coating Operation - Spray Paint Booth #4
R007	Plastic Parts Coating Operation - Spray Paint Booth #5
R008	Plastic Parts Coating Operation - Spray Paint Booth #6

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

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

a. b)(1)g., d)(6), d)(7), d)(8), d)(9), d)(10) and d)(11).

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

a. b)(1)d.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	For emissions unit R007 and R008: The emissions of volatile organic compounds (VOC) from each emissions unit shall not exceed 6.0 pounds per hour.  See b)(2)(c) below.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	For the natural gas-fired oven for emissions units K001, R007 and R008 and for emissions unit K001, see b)(2)b. below.
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	For emissions units K001, R007 and R008, the emissions from the natural gas-fired oven for each emissions unit shall not exceed the following:



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		0.15 pound of nitrogen oxides (NO <sub>x</sub> ) per hour and 0.66 ton of NO <sub>x</sub> per year;  0.12 pound of carbon monoxide (CO) per hour and 0.53 ton of CO per year;  0.001 pound of sulfur dioxide (SO <sub>2</sub> ) per hour and 0.004 ton of SO <sub>2</sub> per year; and  0.03 pound of particulate emissions (PE) per hour and 0.13 ton of PE per year.  The emissions of VOC from emissions unit K001 shall not exceed 8.0 pounds per hour.  See b)(2)a. and b)(2)d. below.
e.	OAC rule 3745-31-05(D) (Synthetic Minor to Avoid Title V and MACT applicability under 40 CFR Part 63, Subpart GG)	See 2 through 6 of Section B. Facility-Wide Terms and Conditions.
h.	OAC rule 3745-17-11(C)	For emissions unit K001, R003, R004, R006, R007 and R008, see c)(1), c)(2) and d)(1) through d)(5) below.
i.	OAC rule 3745-21-19	The facility is excluded from the requirements of this rule because the facility has a potential to emit for VOC of less than 25.0 tons per year for all operations combined where aerospace components and vehicles are cleaned or coated.
j.	OAC rule 3745-114-01 ORC 3704.03(F)(4)	For emissions unit K001, R007 and R008, see d)(6) through d)(9) below.  For emissions unit R006, see d)(10) and d)(11) below.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality



Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the uncontrolled NO<sub>x</sub>, CO, PE, and SO<sub>2</sub> emissions from the natural gas-fired oven associated with each air contaminant source since the uncontrolled potentials to emit for NO<sub>x</sub>, CO, PE, and SO<sub>2</sub> are less than ten tons per year.

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the uncontrolled VOC emissions from emissions unit K001 since the calculated annual emissions rate for VOC is less than 10 tons per year taking into account the federally enforceable rule limitation of 9.95 tons per year based upon a rolling, 12-month summation of the monthly emissions for emissions units K001, R003, R004, R006, R007 and R008, combined, under OAC rule 3745-31-05(D).

- c. The hourly VOC emission limitation is based on each emissions unit's potential to emit. Therefore, no monitoring, record keeping or reporting is required to demonstrate compliance with this emission limitation.
- d. The hourly VOC, NO<sub>x</sub>, CO, PE, and SO<sub>2</sub> and annual NO<sub>x</sub>, CO, PE, and SO<sub>2</sub> emission limitations are based on each emissions unit's potentials to emit. Therefore, no monitoring, record keeping or reporting is required to demonstrate compliance with these emission limitations.

c) **Operational Restrictions**

- (1) The permittee shall install and operate a dry filtration system for the control of particulate emissions whenever the emissions units listed above are in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (2) In the event the particulate filter system(s) is/are not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device(s) shall be expeditiously repaired or otherwise returned to these documented operating conditions.

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

- (1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be



maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (2) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether they are 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.
- (3) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filters while the emissions units listed above are shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (4) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

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

- (5) The permittee shall maintain records that document any time periods when the dry particulate filter(s) was/were 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(s) was/were 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.
- (6) The federally enforceable permit to install and operate (FEPTIO) applications #A0044473 and #A0045799 for this emissions unit, K001 and FEPTIO applications #A0037367 and #A0037123 for these emissions units, R007 and R008, was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit applications; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA



approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
  - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
  - ii. STEL (short term exposure limit) or the ceiling value from the ACGIH "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the MAGLC:

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

For emissions unit K001:

Toxic Contaminant: Methyl Isobutyl Ketone

TLV (mg/m3): 82

Maximum Hourly Emission Rate (lbs/hr): 1.4

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 94

MAGLC (ug/m3): 1952

Toxic Contaminant: Toluene



TLV (mg/m<sup>3</sup>): 75

Maximum Hourly Emission Rate (lbs/hr): 2.1

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 136

MAGLC (ug/m<sup>3</sup>): 1786

Toxic Contaminant: Xylene

TLV (mg/m<sup>3</sup>): 434

Maximum Hourly Emission Rate (lbs/hr): 4.45

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 293

MAGLC (ug/m<sup>3</sup>): 10,333

For emissions units R007 and R008:

Toxic Contaminant: Toluene

TLV (mg/m<sup>3</sup>): 75

Maximum Hourly Emission Rate (lbs/hr): 4.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 273

MAGLC (ug/m<sup>3</sup>): 1785

Toxic Contaminant: Xylene

TLV (mg/m<sup>3</sup>): 434

Maximum Hourly Emission Rate (lbs/hr): 9.32

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 607

MAGLC (ug/m<sup>3</sup>): 10,333

Toxic Contaminant: Methyl Isobutyl Ketone

TLV (mg/m<sup>3</sup>): 82

Maximum Hourly Emission Rate (lbs/hr): 3.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 195

MAGLC (ug/m<sup>3</sup>): 1952

Toxic Contaminant: Ethylene Glycol Mono-ethyl Ether Acetate



TLV (mg/m<sup>3</sup>): 27

Maximum Hourly Emission Rate (lbs/hr): 0.32

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 21

MAGLC (ug/m<sup>3</sup>): 643

The permittee, has demonstrated that emissions of toluene, xylene, methyl ethyl ketone, and ethylene glycol mono-ethyl ether acetate, from emissions units R007 and R008 and that emissions of methyl isobutyl ketone, toluene, and xylene, from emissions unit K001, is calculated to be less than eighty per cent of the MAGLC; any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

- (7) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower TLV than the lowest TLV previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
  - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.



- (8) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
  - b. the MAGLC for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
  - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
  - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- (9) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- (10) The permit to install #16-02101 for this emissions unit R006 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the MAGLC. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: cyclohexanone

TLV (mg/m3): 80

Maximum Hourly Emission Rate (lbs/hr): 0.8

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 231.3

MAGLC (ug/m3): 1905



Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower TLV, as indicated in the most recent version of the handbook entitled "ACGIH," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

- (11) For emissions unit R006, the permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
  - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

e) Reporting Requirements

- (1) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual PER. If no changes to the emissions,



emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

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:**

For emissions unit R007 and R008: The emissions of VOC from each emissions unit shall not exceed 6.0 pounds per hour.

The emissions of VOC from this emissions unit shall not exceed 8.0 pounds per hour.

**Applicable Compliance Method:**

Compliance with the hourly allowable VOC emission limitation above shall be demonstrated by multiplying the VOC content of the worst-case coating, as applied, in pounds of VOC per gallon coating by the maximum hourly coating usage (1 gallon per hour) plus multiplying 0.0054 pound of VOC per MM Btu of heat input\* by the maximum hourly heat input for the drying oven (1.5 MM Btu/hour).

If required, the permittee shall demonstrate compliance with the hourly limitation in accordance with Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.



\*AP-42 emission factor from Table 1.4-2 dated 7/98 convert from lb/10<sup>6</sup> standard cubic feet (scf) to lb/MM Btu, divide by 1,020.

b. Emission Limitation:

0.15 pound of NO<sub>x</sub> per hour

Applicable Compliance Method:

Compliance with the hourly allowable NO<sub>x</sub> emission limitation above shall be demonstrated by multiplying the NO<sub>x</sub> emission factor of 100 pounds of NO<sub>x</sub> emissions per million cubic feet of natural gas fired\* by the maximum hourly natural gas usage.

\*The NO<sub>x</sub> emission factor is from AP-42, 5th edition, Table 1.4-1, dated 7/98

c. Emission Limitation:

0.12 pound of CO per hour

Applicable Compliance Method:

Compliance with the hourly allowable CO emission limitation above shall be demonstrated by multiplying the CO emission factor of 84 pounds of CO emissions per million cubic feet of natural gas fired\* by the maximum hourly natural gas usage.

\*The CO emission factor is from AP-42, 5th edition, Table 1.4-1, dated 7/98

d. Emission Limitation:

0.03 pound of PE per hour

Applicable Compliance Method:

Compliance with the hourly allowable PE limitation above shall be demonstrated by multiplying the PE factor of 7.6 pounds of PE per million cubic feet of natural gas fired\* by the maximum hourly natural gas usage.

\*The PE factor is from AP-42, 5th edition, Table 1.4-2, dated 7/98

e. Emission Limitation:

0.001 pound of SO<sub>2</sub> per hour

Applicable Compliance Method:

Compliance with the hourly allowable SO<sub>2</sub> emission limitation above shall be demonstrated by multiplying the SO<sub>2</sub> emission factor of 0.6 pound of SO<sub>2</sub> emissions per million cubic feet of natural gas fired\* by the maximum hourly natural gas usage.



\*The SO<sub>2</sub> emission factor is from AP-42, 5th edition, Table 1.4-2, dated 7/98

f. Emission Limitations:

0.66 ton of NO<sub>x</sub> per year

0.53 ton of CO per year

0.13 ton of PE per year

0.004 ton of SO<sub>2</sub> per year

Applicable Compliance Method:

Compliance with the annual allowable emission limitations above shall be demonstrated by multiplying the hourly allowable emission limitation by 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitations are maintained, compliance with the annual allowable emission limitations shall be demonstrated.

g) Miscellaneous Requirements

(1) None.