

Facility ID: 0857083245 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

- [Go to Part II for Emissions Unit P001](#)
- [Go to Part II for Emissions Unit P002](#)
- [Go to Part II for Emissions Unit P003](#)
- [Go to Part II for Emissions Unit P004](#)

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0857083245 Emissions Unit ID: P001 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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) None.
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) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Printhead Alignment	OAC rule 3745-31-05(A)(3) PTI 08-04499	0.89 lb/hr and 3.89 tons/yr of organic compounds
	OAC rule 3745-21-07(G)(2)	This operation is exempt from the requirements of this rule pursuant to OAC rule 3745-21-07(G)(9)(c)(iii).

2. Additional Terms and Conditions

- (a) The hourly limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this permit.
The organic compounds (OC) emission limitations specified above includes Hazardous Air Pollutant (HAP) emissions. Therefore it is not necessary to develop separate recording and/or reporting requirements for the HAP emissions.

B. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the operation:
 - a. The company identification for each solvent material employed.
 - b. Whether or not each solvent employed is a photochemically reactive material.
 - c. The number of gallons of each solvent employed.
 - d. The organic compound content of each solvent, in pounds per gallon.
 - e. The total organic compound emission rate for solvents, in pounds per day.
2. The permit to install for this emissions unit (P001) was evaluated based on the actual materials (typically solvents) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application for all processes combined. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Methyl Ethyl Ketone
 TLV (mg/m3): 590 mg/m3
 Maximum Hourly Emission Rate (lbs/hr): 2.11 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 57.37 ug/m3

MAGLC (ug/m3): 14,047 ug/m3

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 Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
3. 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

1. The permittee shall submit deviation reports which identify the days during which photochemically reactive materials were employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (appropriate DO or LAA) within 30 days of the deviation.
2. The permittee shall submit annual reports of the OC emissions rate for this facility. These reports shall be submitted by January 31 of each year to the Director (the appropriate Ohio EPA District Office or local air agency).

E. **Testing Requirements**

1. Compliance Methods:

Compliance with the emissions limitation(s) in section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation -
0.89 lb OC/hr

Applicable Compliance Method -
Compliance shall be determined by multiplying the maximum OC content of all solvents employed by the maximum solvent usage for the emissions unit.

Emission Limitation-
3.89 tons OC/yr

Applicable Compliance Method-
Compliance with the annual organic compound emission limit shall be based upon the record keeping requirements contained in Section C.1. and shall be the sum of the daily OC emissions for the year and divided by 2000 lbs/ton.
2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the solvents.

F. **Miscellaneous Requirements**

1. None

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0857083245 Emissions Unit ID: P002 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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) None.
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) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Printhead Burn-in	OAC rule 3745-31-05(A)(3) PTI 08-04499	0.45 lb/hr and 1.94 tons/yr of organic compounds
	OAC rule 3745-21-07(G)(2)	This operation is exempt from the requirements of this rule pursuant to OAC rule 3745-21-07(G)(9)(c)(iii).

2. Additional Terms and Conditions

- (a) The hourly limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this permit.
The organic compounds (OC) emission limitations specified above includes Hazardous Air Pollutant (HAP) emissions. Therefore it is not necessary to develop separate recording and/or reporting requirements for the HAP emissions.

B. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the operation:
 - a. The company identification for each solvent material employed.
 - b. Whether or not each solvent employed is a photochemically reactive material.
 - c. The number of gallons of each solvent employed.
 - d. The organic compound content of each solvent, in pounds per gallon.
 - e. The total organic compound emission rate for solvents, in pounds per day.
2. The permit to install for this emissions unit (P002) was evaluated based on the actual materials (typically solvents) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application for all processes combined. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Methyl Ethyl Ketone

TLV (mg/m3): 590 mg/m3
Maximum Hourly Emission Rate (lbs/hr): 2.11 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 57.37 ug/m3

MAGLC (ug/m3): 14,047 ug/m3

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 Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in

emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
3. 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

1. The permittee shall submit deviation reports which identify the days during which photochemically reactive materials were employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (appropriate DO or LAA) within 30 days of the deviation.
2. The permittee shall submit annual reports of the OC emissions rate for this facility. These reports shall be submitted by January 31 of each year to the Director (the appropriate Ohio EPA District Office or local air agency).

E. Testing Requirements

1. Compliance Methods:

Compliance with the emissions limitation(s) in section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation -
0.45 lb OC/hr

Applicable Compliance Method -
Compliance shall be determined by multiplying the maximum OC content of all solvents employed by the maximum solvent usage for the emissions unit.

Emission Limitation-
1.94 tons OC/yr

Applicable Compliance Method-
Compliance with the annual organic compound emission limit shall be based upon the record keeping requirements contained in Section C.1. and shall be the sum of the daily OC emissions for the year and divided by 2000 lbs/ton.
2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the solvents.

F. Miscellaneous Requirements

1. None

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0857083245 Emissions Unit ID: P003 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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) None.
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) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Printhead cleaning/Flushing	OAC rule 3745-31-05(A)(3) PTI 08-04499	0.33 lb/hr and 1.45 tons/yr of organic compounds
	OAC rule 3745-21-07(G)(2)	This operation is exempt from the requirements of this rule pursuant to OAC rule 3745-21-07(G)(9)(c)(iii).

2. **Additional Terms and Conditions**

- The hourly limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this permit.
The organic compounds (OC) emission limitations specified above includes Hazardous Air Pollutant (HAP) emissions. Therefore it is not necessary to develop separate recording and/or reporting requirements for the HAP emissions.

B. **Operational Restrictions**

- The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

C. **Monitoring and/or Record Keeping Requirements**

- The permittee shall collect and record the following information for each day for the operation:

- The company identification for each solvent material employed.
- Whether or not each solvent employed is a photochemically reactive material.
- The number of gallons of each solvent employed.
- The organic compound content of each solvent, in pounds per gallon.
- The total organic compound emission rate for solvents, in pounds per day.

- The permit to install for this emissions unit (P001) was evaluated based on the actual materials (typically solvents) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application for all processes combined. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Methyl Ethyl Ketone

TLV (mg/m³): 590 mg/m³
Maximum Hourly Emission Rate (lbs/hr): 2.11 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 57.37 ug/m³

MAGLC (ug/m³): 14,047 ug/m³

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:

- changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - 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
 - 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- 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.
- D. **Reporting Requirements**
 - 1. The permittee shall submit deviation reports which identify the days during which photochemically reactive materials were employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (appropriate DO or LAA) within 30 days of the deviation.
 - 2. The permittee shall submit annual reports of the OC emissions rate for this facility. These reports shall be submitted by January 31 of each year to the Director (the appropriate Ohio EPA District Office or local air agency).
- E. **Testing Requirements**
 - 1. Compliance Methods:

Compliance with the emissions limitation(s) in section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation -
0.33 lb OC/hr

Applicable Compliance Method -
Compliance shall be determined by multiplying the maximum OC content of all solvents employed by the maximum solvent usage for the emissions unit.

Emission Limitation-
1.45 tons OC/yr

Applicable Compliance Method-
Compliance with the annual organic compound emission limit shall be based upon the record keeping requirements contained in Section C.1. and shall be the sum of the daily OC emissions for the year and divided by 2000 lbs/ton.
 - 2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the solvents.
- F. **Miscellaneous Requirements**
 - 1. None

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0857083245 Emissions Unit ID: P004 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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) None.
- 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) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
System Verification	OAC rule 3745-31-05(A)(3) PTI 08-04499	0.44 lb/hr and 1.95 tons/yr of organic compounds
	OAC rule 3745-21-07(G)(2)	This operation is exempt from the requirements of this rule pursuant to OAC rule 3745-21-07(G)(9)(c)(iii).

- 2. **Additional Terms and Conditions**
 - (a) The hourly limitation was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure

compliance with this permit.

The organic compounds (OC) emission limitations specified above includes Hazardous Air Pollutant (HAP) emissions. Therefore it is not necessary to develop separate recording and/or reporting requirements for the HAP emissions.

B. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the operation:
 - a. The company identification for each solvent material employed.
 - b. Whether or not each solvent employed is a photochemically reactive material.
 - c. The number of gallons of each solvent employed.
 - d. The organic compound content of each solvent, in pounds per gallon.
 - e. The total organic compound emission rate for solvents, in pounds per day.
2. The permit to install for this emissions unit (P001) was evaluated based on the actual materials (typically solvents) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application for all processes combined. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Methyl Ethyl Ketone

TLV (mg/m3): 590 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 2.11 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 57.37 ug/m3

MAGLC (ug/m3): 14,047 ug/m3

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 Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
3. 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

D. Reporting Requirements

1. The permittee shall submit deviation reports which identify the days during which photochemically reactive materials were employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of material(s) emitted during each such day, in pounds. Each report shall be submitted to the Director (appropriate DO or LAA) within 30 days of the deviation.
2. The permittee shall submit annual reports of the OC emissions rate for this facility. These reports shall be submitted by January 31 of each year to the Director (the appropriate Ohio EPA District Office or local air agency).

E. Testing Requirements

1. Compliance Methods:

Compliance with the emissions limitation(s) in section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation -
0.44 lb OC/hr

Applicable Compliance Method -

Compliance shall be determined by multiplying the maximum OC content of all solvents employed by the maximum solvent usage for the emissions unit.

Emission Limitation-
1.95 tons OC/yr

Applicable Compliance Method-

Compliance with the annual organic compound emission limit shall be based upon the record keeping requirements contained in Section C.1. and shall be the sum of the daily OC emissions for the year and divided by 2000 lbs/ton.

2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the solvents.

F. Miscellaneous Requirements

1. None