



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION  
WARREN COUNTY**

**CERTIFIED MAIL**

Street Address:

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

Mailing Address:

Lazarus Gov.  
Center

**Application No: 14-02955**

**DATE: 3/5/2002**

Blackhawk Automotive Plastics Inc  
Bruce Tolson  
4219 US Route 42  
Mason, OH 45040

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
236 East Town Street, Room 300  
Columbus, Ohio 43215

Very truly yours,

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

CC: USEPA

HCDES



**Permit To Install  
Terms and Conditions**

**Issue Date: 3/5/2002  
Effective Date: 3/5/2002**

**FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 14-02955**

Application Number: 14-02955  
APS Premise Number: 1483090101  
Permit Fee: **\$200**  
Name of Facility: Blackhawk Automotive Plastics Inc  
Person to Contact: Bruce Tolson  
Address: 4219 US Route 42  
Mason, OH 45040

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**4219 US Route 42  
Mason, Ohio**

Description of proposed emissions unit(s):  
**Administrative modification to the PTI 14-2955 (issued 7/7/94) equipment description for R031 and terms and conditions for R031 and R032.**

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

## Part I - GENERAL TERMS AND CONDITIONS

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

#### 1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - i. The date, place (as defined in the permit), and time of sampling or measurements.
  - ii. The date(s) analyses were performed.
  - iii. The company or entity that performed the analyses.
  - iv. The analytical techniques or methods used.
  - v. The results of such analyses.
  - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
  - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous

calendar quarters. See B.10 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

## **2. Scheduled Maintenance/Malfunction Reporting**

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

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

## **3. Risk Management Plans**

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

## **4. Title IV Provisions**

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

## **5. Severability Clause**

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

declared invalid.

## 6. General Requirements

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

## 7. Fees

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

## 8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are

required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

## **9. Compliance Requirements**

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

#### **10. Permit To Operate Application**

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

#### **11. Best Available Technology**

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

#### **12. 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.

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

### **1. Compliance Requirements**

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

### **2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements**

The permittee shall submit required reports in the following manner:

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

### **3. Permit Transfers**

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

### **4. Termination of Permit To Install**

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

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

#### **5. Construction of New Sources(s)**

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

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

#### **6. 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.

#### **7. 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).

**8. Construction Compliance Certification**

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

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

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

**C. Permit To Install Summary of Allowable Emissions**

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	87.6

11

Blackhawk Automotive Plastics Inc

PTI Application: **14-02955**

**Modification Issued: 3/5/2002**

Facility ID: **1483090101**

12

Blackt

PTI A<sub>1</sub>

**Modification Issued: 3/5/2002**

Emissions Unit ID: R031

**Part II - FACILITY SPECIFIC TERMS AND CONDITIONS**

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

None

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

None

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

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
R031 - Plastic parts coating line with Zeolite wheel and thermal oxidizer (Torrid Line Booths A1 - A6) *modification	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-07(A)(1)
		OAC rule 3745-21-07(G)(1)
		OAC rule 3745-21-07(G)(2)
		OAC rule 3745-21-07(G)(6)
	OAC rule 3745-31-05(D)	
OAC rule 3745-17-11(B)		

Blackt

PTI A<sub>1</sub>**Modification Issued: 3/5/2002**

Emissions Unit ID: R031

<u>Applicable Emissions Limitations/Control Measures</u>	
470 lbs/day OC (including cleanup) from the controlled booths of R031 and R032 combined (A1-A4, A6 and B1-B4);	87.6 TPY OC, based upon a rolling, 12-month summation from all of the booths of R031 and R032 combined.  0.551 lb/hr of particulate emissions based on Table I of OAC rule 3745-17-11(B).
420 lbs/day OC (including cleanup) from the uncontrolled booths of R031 and R032 combined (A5 and B5);	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
See T&Cs A.2.a. through A.2.f.	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-31-05(A)(3). See T&C A.2.e.
The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11(B), 3745-17-07(A)(1), 3745-21-07(G)(1), 3745-21-07(G)(2) and 3745-21-07(G)(6).	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-31-05(A)(3). See T&Cs A.2.d. and A.2.f.
49.4 TPY OC, based upon a rolling, 12-month summation from the controlled booths of R031 and R032 combined (A1-A4, A6 and B1-B4);	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-31-05(A)(3). See T&C A.2.f.
38.2 TPY OC, based upon a rolling, 12-month summation from the uncontrolled booths of R031 and R032 combined (A5 and B5);	

**Modification Issued: 3/5/2002****2. Additional Terms and Conditions**

- 2.a** The OC content of each coating employed in the controlled booths of R031 and R032 (A1-A4, A6 and B1-B4, respectively) shall not exceed 5.2 pounds of OC per gallon of coating, based upon a daily volume-weighted average of the OC content.
- 2.b** The OC content of each coating employed in the uncontrolled booths of R031 and R032 (A5 and B5, respectively) shall not exceed 5.0 pounds of OC per gallon of coating.
- 2.c** The OC content of each cleanup material employed in the uncontrolled and controlled booths of R031 and R032 (A1-A6 and B1-B5, respectively) shall not exceed 6.71 pounds of OC per gallon of cleanup material.
- 2.d** The permittee shall not exceed the following emissions limits in each uncontrolled booth (A5 and B5) on any day that photochemically reactive materials are used: 8 lbs/hour OC and 40 lbs/day OC.
- 2.e** The OC emissions from the oven associated with R031 shall not exceed 3 pounds per hour and 15 pounds per day, unless said emissions have been reduced by at least 85%.
- 2.f** The permittee shall vent booths A1 through A4 and A6 and the oven associated with R031 and booths B1 through B4 and the oven associated with R032 to the thermal oxidizer.

The permittee shall operate and maintain the thermal oxidizer serving the spray booths and ovens such that the overall control efficiency for R031 and R032 is equal to or greater than 85% (by weight) for organic compounds.

Emissions of organic materials into the atmosphere required to be controlled by paragraphs (G)(1) and (G)(2) of OAC rule 3745-21-07 shall be reduced by incineration provided that 90% or more of the carbon in the organic material being incinerated is oxidized to carbon dioxide.

- 2.g** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the Applicable Emissions Limitations and Control Requirements and the Additional Terms and Conditions in A.I.1. through A.I.2.f., compliance with the Operational Restrictions in Terms A.II.1. through A.II.8. and the use of a control device with an overall control efficiency equal to or greater than 85%.

**II. Operational Restrictions**

1. The maximum daily usage rates for emissions units R031 and R032 combined shall not exceed the following:
  - a. 587 gallons per day of coatings employed in the controlled booths (A1-A4, A6 and B1-B4);
  - b. 80 gallons per day of coatings employed in the uncontrolled booths (A5 and B5);
  - c. 12 gallons per day of cleanup materials employed in the controlled booths (A1-A4, A6 and B1-B4); and
  - d. 3 gallons per day of cleanup materials employed in the uncontrolled booths (A5 and B5).
2. The maximum annual usage rates for emissions units R031 and R032 combined shall not exceed the following based upon rolling, 12-month summations:
  - a. 125,460 gallons per year of coatings employed in the controlled booths (A1-A4, A6 and B1-B4);
  - b. 15,000 gallons per year of coatings employed in the uncontrolled booths (A5 and B5);
  - c. 876 gallons per year of cleanup materials employed in the controlled booths (A1-A4, A6 and B1-B4); and

**Modification Issued: 3/5/2002**

- d. 222 gallons per year of cleanup materials employed in the uncontrolled booths (A5 and B5).
3. The average temperature of the exhaust gases from the combustion zone of the thermal incinerator, for any 3-hour block of time, shall not be less than 1200 degrees Fahrenheit.
4. The average temperature of the desorption air stream prior to the VOC concentrator wheel, for any 3-hour block of time, shall not be less than 350 degrees Fahrenheit.
5. The average temperature of the concentrated VOC laden air stream prior to the thermal incinerator, for any 3-hour block of time, shall not be less than 120 degrees Fahrenheit.
6. The pressure drop across the three 3-stage particulate filters shall be maintained within the range of 0.5 - 1.5 inches of water while the emissions unit is in operation.
7. The permittee shall operate the exhaust fans in each controlled spray booth in the coating line such that an overall negative pressure differential is maintained between the exterior of the booth and the interior of the booth in order to eliminate fugitive OC emissions from the booths.
8. The permittee shall operate the dry filters in each spray booth whenever this emissions unit is in operation.

**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each day for R031 and R032, combined:
  - a. The company identification of each coating and cleanup material employed and whether each coating and cleanup material is a photochemically reactive material;
  - b. The number of gallons of each coating and cleanup material employed and the number of gallons of all coatings and all cleanup materials employed in the controlled booths of R031 and R032 combined (A1 through A4, A6 and B1 through B4, respectively);
  - c. The number of gallons of each coating and cleanup material employed and the number of gallons of all coatings and all cleanup materials employed in the uncontrolled booths of R031 and R032 combined (A5 and B5, respectively);
  - d. The organic compound content, in pounds per gallon, of each coating and cleanup material employed in the controlled booths of R031 and R032 (A1 through A4, A6 and

**Modification Issued: 3/5/2002**

B1 through B4, respectively). The OC content for the coatings shall be calculated as a daily volume-weighted average in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for  $C_{VOC,2}$ ;

- e. The organic compound content, in pounds per gallon, of each coating and cleanup material employed in the uncontrolled booths of R031 and R032 (A5 and B5, respectively);
- f. The uncontrolled OC emission rate, in pounds per day, from all coatings and cleanup materials employed in the controlled booths of R031 and R032 combined (A1 through A4, A6 and B1 through B4, respectively);
- g. The uncontrolled OC emission rate, in pounds per day, from all coatings and cleanup materials employed in the uncontrolled booths of R031 and R032 combined (A5 and B5, respectively);
- h. The total hours of operation of the thermal incinerator, in hours per day;
- i. The calculated controlled emissions from the rotor wheelhouse, based upon the CEM data, in pounds per day;
- j. The calculated controlled emissions from the thermal incinerator, in pounds per day, using the hourly emission rate from the latest emissions test;
- k. The total controlled emissions, in pounds per day, from the rotor wheelhouse and the thermal incinerator;
- l. The calculated fugitive emissions from the controlled booths of R031 and R032, in pounds per day, using the hourly emission rate from the latest emissions test; and
- m. The overall control efficiency for the controlled booths of R031 and R032, in percent,  $[(f + 1 - k)/(f + 1) \times 100\%]$ .

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. The permittee shall collect and record the following information each month for R031 and R032 combined:
  - a. The number of gallons of all coatings employed and the rolling, 12-month summation of

Emissions Unit ID: R031

- the number of gallons of all coatings employed in the controlled booths of R031 and R032 combined (A1 through A4, A6 and B1 through B4, respectively);
- b. The number of gallons of all coatings employed and the rolling, 12-month summation of the number of gallons of all coatings employed in the uncontrolled booths of R031 and R032 combined (A5 and B5, respectively);
  - c. The number of gallons of all cleanup materials employed and the rolling, 12-month summation of the number of gallons of all cleanup materials employed in the controlled booths of R031 and R032 combined (A1 through A4, A6 and B1 through B4, respectively);
  - d. The number of gallons of all cleanup materials employed and the rolling, 12-month summation of the number of gallons of all cleanup materials employed in the uncontrolled booths of R031 and R032 combined (A5 and B5, respectively);
  - e. The controlled OC emissions, in tons per month, and the rolling, 12-month summation of controlled OC emissions, in tons per year, from all coatings and cleanup materials employed in the controlled booths of R031 and R032 combined (A1 through A4, A6 and B1 through B4, respectively);
  - f. The uncontrolled OC emissions, in tons per month, and the rolling, 12-month summation of uncontrolled OC emissions, in tons per year, from all coatings and cleanup materials employed in the uncontrolled booths of R031 and R032 combined (A5 and B5, respectively); and
  - g. The total (controlled booths plus uncontrolled booths) OC emissions, in tons per month, and the total (controlled booths plus uncontrolled booths) rolling, 12-month summation of OC emissions, in tons per year, from all coatings and cleanup materials employed in R031 and R032 combined.
3. The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the temperature at the following points when the emissions unit is in operation:
- a. The temperature of the exhaust gases from the combustion zone of the thermal incinerator;
  - b. The temperature of the desorption air stream prior to the VOC concentrator wheel; and
  - c. The temperature of the concentrated VOC laden air stream prior to the incinerator.

Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within 1 percent of the temperature being measured or 5 degrees Fahrenheit, whichever is greater. The temperature monitors and recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's

**Modification Issued: 3/5/2002**

recommendations, instructions and operating manuals.

The permittee shall collect and record the average temperature from the monitoring points listed in a, b, and c above for each of the 8 3-hours blocks during the day. The permittee shall maintain a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

4. The permittee shall maintain daily records that document any time periods when the dry filters in any booth were not in service when the emissions unit was in operation.
5. The permittee shall collect and record the following information for each day for the uncontrolled booth (A5) of R031:
  - a. The company identification for each coating and photochemically reactive cleanup material employed;
  - b. The number of gallons of each coating and photochemically reactive cleanup material employed;
  - c. The organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;
  - d. For each day during which a photochemically reactive material (coating or cleanup material) is employed, the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;
  - e. For each day during which a photochemically reactive material (coating or cleanup material) is employed, the total number of hours the emissions unit was in operation; and
  - f. For each day during which a photochemically reactive material (coating or cleanup material) is employed, the average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).
6. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the 3-stage filters while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the 3-stage filters on a daily basis.
7. The permittee shall measure and record the pressure differential between the exterior and the

**Modif**

Emissions Unit ID: R031

interior of each controlled spray booth in the coating line while the emissions unit is in operation to ensure compliance with the operational restriction in section A.II.7. The permittee shall record any adjustments to the fans which alter or change the air flow in the spray booths and capture and control system.

8. The permittee shall operate and maintain equipment to continuously monitor and record organic compounds in the exhaust gases from the rotor wheelhouse when the emissions unit is in operation. The organic monitoring device and recorder shall be capable of satisfying the performance requirements specified in 40 CFR 60, Appendix B, Performance Specification 8 or Performance Specification 9. Prior to any compliance demonstration, the permittee shall demonstrate that the organic monitoring device and recorder satisfy the requirements of Performance Specification 8 or Performance Specification 9. The organic compound monitoring device and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall maintain daily records of all data obtained by the continuous organic compound monitoring system including, but not limited to parts per million organic compound on an instantaneous (one-minute) basis and emissions of organic compound in units of the applicable standard (i.e., generate data in pounds of organic compounds per hour and pounds of organic compounds per day using an approved response factor). The permittee shall also maintain daily records of the results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

The permittee shall also maintain daily records of any downtime for the continuous organic monitoring device and recorder.

**IV. Reporting Requirements**

1. The permittee shall submit quarterly temperature deviation (excursion) reports that identify:
  - a. All 3-hour blocks of time during which the average temperature of the exhaust gases from the thermal incinerator does not comply with the temperature limitation specified in section A.II.3. of these terms and conditions;
  - b. All 3-hour blocks of time during which the average temperature of the desorption air stream prior to the VOC concentrator wheel does not comply with the temperature limitation specified in section A.II.4. of these terms and conditions; and
  - c. All 3-hour blocks of time during which the average temperature of the concentrated VOC laden air stream prior to the incinerator does not comply with the temperature limitation specified in section A.II.5. of these terms and conditions.

If no deviations occurred during a reporting period then the report submitted by the permittee shall state so. The permittee shall submit the reports to Hamilton County Department of Environmental Services. Refer to the General Terms and Conditions for the required quarterly report due dates.

2. The permittee shall submit quarterly deviation (excursion) reports which include the following information for the uncontrolled booth (A5) of R031:
  - a. An identification of each day during which a photochemically reactive material was employed and the average hourly organic compound emissions from all the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
  - b. An identification of each day during which a photochemically reactive material was employed and the organic compound emissions from all the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

If no deviations occurred during a reporting period then the report submitted by the permittee shall state so. The permittee shall submit the reports to Hamilton County Department of Environmental Services. Refer to the General Terms and Conditions for the required quarterly report due dates.

**Modification Issued: 3/5/2002**

3. The permittee shall submit quarterly reports that identify all deviations (excursions) of the following emission limitations and operational restrictions:
  - a. The lbs per gallon OC content limits for coatings and cleanup materials in section A.I.2.a through A.I.2.c.;
  - b. The daily controlled and uncontrolled OC emissions limits for R031 and R032 combined in section A.I.1.;
  - c. The daily coating and cleanup usage limits for R031 and R032 combined in section A.II.1.; and
  - d. The daily overall control efficiency limitations in sections A.I.2.e. and A.I.2.f.

If no exceedances occurred during a reporting period then the report submitted by the permittee shall state so. The permittee shall submit the reports to Hamilton County Department of Environmental Services. Refer to the General Terms and Conditions for the required quarterly report due dates.

4. The permittee shall submit quarterly reports which specify the rolling, 12-month emissions and usages for R031 and R032 combined for each calendar month during the quarter. These reports shall include the following information for each calendar month:
  - a. The rolling, 12-month OC emissions, in tons, from the uncontrolled booths of R031 and R032 combined (A5 and B5, respectively);
  - b. The rolling, 12-month OC emissions, in tons, from the controlled booths of R031 and R032 combined (A1 through A4, A6 and B1 through B4, respectively);
  - c. The rolling, 12-month total (uncontrolled and controlled) OC emissions, in tons, from R031 and R032 combined;
  - d. The rolling, 12-month coating usage, in gallons, for the uncontrolled booths of R031 and R032 combined (A5 and B5, respectively);
  - e. The rolling, 12-month coating usage, in gallons, for the controlled booths of R031 and R032 combined (A1 through A4, A6 and B1 through B4, respectively);
  - f. The rolling, 12-month cleanup material usage, in gallons, for the uncontrolled booths of R031 and R032 combined (A5 and B5, respectively); and

**Modification Issued: 3/5/2002**

- g. The rolling, 12-month cleanup material usage, in gallons, for the controlled booths of R031 and R032 combined (A1 through A4, A6 and B1 through B4, respectively).

The permittee shall submit the reports to Hamilton County Department of Environmental Services. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

5. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing that any of the dry filters in the booths were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days after the event occurs.
6. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the 3-stage filters did not comply with the allowable range specified in section A.II.6 of these terms and conditions.

If no deviations occurred during a reporting period then the report submitted by the permittee shall state so. The permittee shall submit the reports to Hamilton County Department of Environmental Services. Refer to the General Terms and Conditions for the required quarterly report due dates.

7. The permittee shall submit quarterly deviation reports that identify all periods of time during which the weekly inspections did not indicate a negative pressure differential between the exterior and interior of any spray booth in the coating line. The report shall also include an identification of the booth and the pressure differential reading.

If no deviations occurred during a reporting period then the report submitted by the permittee shall state so. The permittee shall submit the reports to Hamilton County Department of Environmental Services. Refer to the General Terms and Conditions for the required quarterly report due dates.

8. The permittee shall submit reports within 30 days following the end of each calendar quarter to the Hamilton County Department of Environmental Services documenting any periods where the concentration of organic compounds from the wheelhouse may indicate the performance of the concentrator has decreased. The report shall also include any continuous organic compound monitoring system downtime while the emissions unit was on-line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason and corrective action(s)

**Modif**

Emissions Unit ID: R031

taken for each time period of source and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall also be included in the quarterly report.

If there are no periods where the concentration of OC indicates the concentrator performance has decreased or there are no periods of monitor downtime during the calendar quarter, the permittee shall submit a statement to that effect. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

**Modification Issued: 3/5/2002**

## **V. Testing Requirements**

1. Compliance with the OC emissions limitations and usage restrictions in sections A.I. and A.II. shall be demonstrated by the recordkeeping requirements in section A.III. and the testing requirements in section A.V.2.
2. The permittee shall conduct, or have conducted, emission testing for emissions units R031 and R032 from emissions points within each coating line sufficient to determine compliance with the control requirements in sections A.I.2.e. and A.I.2.f. of these terms and conditions. The permittee shall conduct the emission testing in accordance with the following requirements:
  - a. The emission testing shall be conducted within 3 months after issuance of this permit and every 2.5 years thereafter.;
  - b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for organic compounds (85%) from R031 and R032, the overall control efficiency limitation for organic compounds from the heat-curing ovens associated with R031 and R032, and the control (destruction) efficiency limitation for organic compounds (90%) for the thermal incinerator associated with R031 and R032.
  - c. The test methods which the permittee must employ are specified in A.V.2.d. and A.V.2.e. below.
  - d. The capture efficiency shall be determined using methods 204 through 204F, as specified in 40 CFR 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with USEPA's "Guidelines for Determining Capture Efficiency", dated January 9, 1995.

The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.

- e. The control efficiency (i.e. the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or the approved alternative test protocol (e.g., the mass balance protocol approved on 10/25/95).

The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

Blackhawk Automotive Plastics Inc

PTI Application: **14-03055**

**Modif**

Facility ID: **1483090101**

Emissions Unit ID: R031

- f. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Hamilton County Department of Environmental Services.

**Modification Issued: 3/5/2002**

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Hamilton County Department of Environmental Services refusal to accept the results of the emission test(s).

Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Hamilton County Department of Environmental Services.

3. Formulation data or USEPA method 24 shall be used to determine the OC contents of the coatings and cleanup materials.
4. Compliance with the particulate emission limitation in section A.I.1. of these terms and conditions shall be demonstrated by the following:

Emission limitation: 0.551 lb/hr of particulate emissions

Compliance Method:

Compliance with the particulate emission limit shall be determined in accordance with the following method:

To determine the actual worst case emission rate for particulate matter, the following equation shall be used:

$$E = \text{maximum coating solids usage rate (in pounds per hour)} \times (1-TE) \times (1-CE)$$

E = particulate matter emissions rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the

**Modification Issued: 3/5/2002**

coated part to the amount of coating solids used

CE = control efficiency of the control equipment

5. Compliance with the visible particulate emissions limitation in section A.I.1. of these terms and conditions shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

**VI. Miscellaneous Requirements**

1. If probable cause exist indicating the source is causing or contributing to a nuisance in violation of Ohio Administrative Code rule 3475-15-07, the owner or operator of this emissions unit shall be required to submit and implement a control program which will bring this source into compliance.
2. Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous organic compound monitoring system designed to ensure continuous valid and representative readings of organic compounds. The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous organic compound monitoring system must be kept on site and available for inspection during regular office hours.

**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R031 - Plastics parts coating line with Zeolite wheel and thermal oxidizer (Torrid Line Booths B1 - B5)	None	None

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
R032 - Plastic parts coating line with Zeolite wheel and thermal oxidizer (Torrid Line Booths B1 - B5) *modification	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-11(B)
		OAC rule 3745-17-07(A)(1)
		OAC rule 3745-21-07(G)(1)
		OAC rule 3745-21-07(G)(2)
	OAC rule 3745-31-05(D)	OAC rule 3745-21-07(G)(6)

Applicable Emissions <u>Limitations/Control</u> <u>Measures</u>	
470 lbs/day OC (including cleanup) from the controlled booths of R031 and R032 combined (A1-A4, A6 and B1-B4);	87.6 TPY OC, based upon a rolling, 12-month summation from all of the booths of R031 and R032 combined.
420 lbs/day OC (including cleanup) from the uncontrolled booths of R031 and R032 combined (A5 and B5);	0.551 lb/hr of particulate emissions based on Table I of OAC rule 3745-17-11(B).
See T&Cs A.2.a. through A.2.f.	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11(B), 3745-17-07(A)(1), 3745-21-07(G)(1), 3745-21-07(G)(2) and 3745-21-07(G)(6).	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-31-05(A)(3). See T&C A.2.e.
49.4 TPY OC, based upon a rolling, 12-month summation from the controlled booths of R031 and R032 combined (A1-A4, A6 and B1-B4);	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-31-05(A)(3). See T&Cs A.2.d. and A.2.f.
38.2 TPY OC, based upon a rolling, 12-month summation from the uncontrolled booths of R031 and R032 combined (A5 and B5);	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-31-05(A)(3). See T&C A.2.f.

**Modification Issued: 3/5/2002****2. Additional Terms and Conditions**

- 2.a** The OC content of each coating employed in the controlled booths of R031 and R032 (A1-A4, A6 and B1-B4, respectively) shall not exceed 5.2 pounds of OC per gallon of coating, based upon a daily volume-weighted average of the OC content.
- 2.b** The OC content of each coating employed in the uncontrolled booths of R031 and R032 (A5 and B5, respectively) shall not exceed 5.0 pounds of OC per gallon of coating.
- 2.c** The OC content of each cleanup material employed in the uncontrolled and controlled booths of R031 and R032 (A1-A6 and B1-B5, respectively) shall not exceed 6.71 pounds of OC per gallon of cleanup material.
- 2.d** The permittee shall not exceed the following emissions limits in the uncontrolled booths of R031 and R032 (A5 and B5, respectively) on any day that photochemically reactive materials are used: 8 lbs/hour OC and 40 lbs/day OC.
- 2.e** The OC emissions from the oven associated with R032 shall not exceed 3 pounds per hour and 15 pounds per day, unless said emissions have been reduced by at least 85%.
- 2.f** The permittee shall vent booths A1 through A4 and A6 and the oven associated with R031 and booths B1 through B4 and the oven associated with R032 to the thermal oxidizer.

The permittee shall operate and maintain the thermal oxidizer serving the spray booths and ovens such that the overall control efficiency for R031 and R032 is equal to or greater than 85% (by weight) for organic compounds.

Emissions of organic materials into the atmosphere required to be controlled by paragraphs (G)(1) and (G)(2) of OAC rule 3745-21-07 shall be reduced by incineration provided that 90% or more of the carbon in the organic material being incinerated is oxidized to carbon dioxide.

- 2.g** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the Applicable Emissions Limitations and Control Requirements and the Additional Terms and Conditions in A.I.1. through A.I.2.f., compliance with the Operational Restrictions in Terms A.II.1. through A.II.8. and the use of a control device with an overall control efficiency equal to or greater than 85%.

**II. Operational Restrictions**

1. The maximum daily usage rates for emissions units R031 and R032 combined shall not exceed the following:
  - a. 587 gallons per day of coatings employed in the controlled booths (A1-A4, A6 and B1-B4);
  - b. 80 gallons per day of coatings employed in the uncontrolled booths (A5 and B5);
  - c. 12 gallons per day of cleanup materials employed in the controlled booths (A1-A4, A6 and B1-B4); and
  - d. 3 gallons per day of cleanup materials employed in the uncontrolled booths (A5 and B5).
2. The maximum annual usage rates for emissions units R031 and R032 combined shall not exceed the following based upon rolling, 12-month summations:
  - a. 125,460 gallons per year of coatings employed in the controlled booths (A1-A4, A6 and B1-B4);
  - b. 15,000 gallons per year of coatings employed in the uncontrolled booths (A5 and B5);
  - c. 876 gallons per year of cleanup materials employed in the controlled booths (A1-A4, A6 and B1-B4); and
  - d. 222 gallons per year of cleanup materials employed in the uncontrolled booths (A5 and B5).
3. The average temperature of the exhaust gases from the combustion zone of the thermal incinerator, for any 3-hour block of time, shall not be less than 1200 degrees Fahrenheit.
4. The average temperature of the desorption air steam prior to the VOC concentrator wheel, for any 3-hour block of time, shall not be less than 350 degrees Fahrenheit.
5. The average temperature of the concentrated VOC laden air stream prior to the thermal incinerator, for any 3-hour block of time, shall not be less than 120 degrees Fahrenheit.
6. The pressure drop across the three 3-stage particulate filters shall be maintained within the range of 0.5 - 1.5 inches of water while the emissions unit is in operation.
7. The permittee shall operate the exhaust fans in each controlled spray booth in the coating line such that an overall negative pressure differential is maintained between the exterior of the booth and the interior of the booth in order to eliminate fugitive OC emissions from the booths.
8. The permittee shall operate the dry filters in each spray booth whenever this emissions unit is in operation.

### III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for R031 and R032, combined:
  - a. The company identification of each coating and cleanup material employed and whether each coating and cleanup material is a photochemically reactive material;
  - b. The number of gallons of each coating and cleanup material employed and the number of gallons of all coatings and all cleanup materials employed in the controlled booths of R031 and R032 combined (A1 through A4, A6 and B1 through B4, respectively);
  - c. The number of gallons of each coating and cleanup material employed and the number of gallons of all coatings and all cleanup materials employed in the uncontrolled booths of R031 and R032 combined (A5 and B5, respectively);
  - d. The organic compound content, in pounds per gallon, of each coating and cleanup material employed in the controlled booths of R031 and R032 (A1 through A4, A6 and B1 through B4, respectively). The OC content for the coatings shall be calculated as a daily volume-weighted average in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for  $C_{VOC,2}$ ;
  - e. The organic compound content, in pounds per gallon, of each coating and cleanup material employed in the uncontrolled booths of R031 and R032 (A5 and B5, respectively);
  - f. The uncontrolled OC emission rate, in pounds per day, from all coatings and cleanup materials employed in the controlled booths of R031 and R032 combined (A1 through A4, A6 and B1 through B4, respectively);
  - g. The uncontrolled OC emission rate, in pounds per day, from all coatings and cleanup materials employed in the uncontrolled booths of R031 and R032 combined (A5 and B5, respectively);
  - h. The total hours of operation of the thermal incinerator, in hours per day;
  - i. The calculated controlled emissions from the rotor wheelhouse, based upon the CEM data, in pounds per day;

**Modif**

Emissions Unit ID: R032

- j. The calculated controlled emissions from the thermal incinerator, in pounds per day, using the hourly emission rate from the latest emissions test;
  - k. The total controlled emissions, in pounds per day, from the rotor wheelhouse and the thermal incinerator;
  - l. The calculated fugitive emissions from the controlled booths of R031 and R032, in pounds per day, using the hourly emission rate from the latest emissions test; and
  - m. The overall control efficiency for the controlled booths of R031 and R032, in percent,  $[(f + 1 - k)/(f + 1) \times 100\%]$ .
- [Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]
- 2. The permittee shall collect and record the following information each month for R031 and R032 combined:
    - a. The number of gallons of all coatings employed and the rolling, 12-month summation of the number of gallons of all coatings employed in the controlled booths of R031 and R032 combined (A1 through A4, A6 and B1 through B4, respectively);
    - b. The number of gallons of all coatings employed and the rolling, 12-month summation of the number of gallons of all coatings employed in the uncontrolled booths of R031 and R032 combined (A5 and B5, respectively);
    - c. The number of gallons of all cleanup materials employed and the rolling, 12-month summation of the number of gallons of all cleanup materials employed in the controlled booths of R031 and R032 combined (A1 through A4, A6 and B1 through B4, respectively);
    - d. The number of gallons of all cleanup materials employed and the rolling, 12-month summation of the number of gallons of all cleanup materials employed in the uncontrolled booths of R031 and R032 combined (A5 and B5, respectively);
    - e. The controlled OC emissions, in tons per month, and the rolling, 12-month summation of controlled OC emissions, in tons per year, from all coatings and cleanup materials employed in the controlled booths of R031 and R032 combined (A1 through A4, A6 and B1 through B4, respectively);
    - f. The uncontrolled OC emissions, in tons per month, and the rolling, 12-month summation of uncontrolled OC emissions, in tons per year, from all coatings and cleanup materials employed in the uncontrolled booths of R031 and R032 combined (A5 and B5, respectively); and
    - g. The total (controlled booths plus uncontrolled booths) OC emissions, in tons per month,

**Modification Issued: 3/5/2002**

and the total (controlled booths plus uncontrolled booths) rolling, 12-month summation of OC emissions, in tons per year, from all coatings and cleanup materials employed in R031 and R032 combined.

3. The permittee shall operate and maintain continuous temperature monitors and recorders which measure and record the temperature at the following points when the emissions unit is in operation:
  - a. The temperature of the exhaust gases from the combustion zone of the thermal incinerator;
  - b. The temperature of the desorption air stream prior to the VOC concentrator wheel; and
  - c. The temperature of the concentrated VOC laden air stream prior to the incinerator.

Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within 1 percent of the temperature being measured or 5 degrees Fahrenheit, whichever is greater. The temperature monitors and recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the average temperature from the monitoring points listed in a, b, and c above for each of the 8 3-hours blocks during the day. The permittee shall maintain a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

4. The permittee shall maintain daily records that document any time periods when the dry filters in any booth were not in service when the emissions unit was in operation.
5. The permittee shall collect and record the following information for each day for the uncontrolled booth (B5) of R032:
  - a. The company identification for each coating and photochemically reactive cleanup material employed;
  - b. The number of gallons of each coating and photochemically reactive cleanup material employed;
  - c. The organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;

- d. For each day during which a photochemically reactive material (coating or cleanup material) is employed, the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;
  - e. For each day during which a photochemically reactive material (coating or cleanup material) is employed, the total number of hours the emissions unit was in operation; and
  - f. For each day during which a photochemically reactive material (coating or cleanup material) is employed, the average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).
6. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the 3-stage filters while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the 3-stage filters on a daily basis.
  7. The permittee shall measure and record the pressure differential between the exterior and the interior of each controlled spray booth in the coating line while the emissions unit is in operation to ensure compliance with the operational restriction in section A.II.7. The permittee shall record any adjustments to the fans which alter or change the air flow in the spray booths and capture and control system.
  8. The permittee shall operate and maintain equipment to continuously monitor and record organic compounds in the exhaust gases from the rotor wheelhouse when the emissions unit is in operation. The organic monitoring device and recorder shall be capable of satisfying the performance requirements specified in 40 CFR 60, Appendix B, Performance Specification 8 or Performance Specification 9. Prior to any compliance demonstration, the permittee shall demonstrate that the organic monitoring device and recorder satisfy the requirements of Performance Specification 8 or Performance Specification 9. The organic compound monitoring device and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall maintain daily records of all data obtained by the continuous organic compound monitoring system including, but not limited to parts per million organic compound on an instantaneous (one-minute) basis and emissions of organic compound in units of the applicable standard (i.e., generate data in pounds of organic compounds per hour and pounds of organic compounds per day using an approved response factor). The permittee shall also maintain daily records of the results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

The permittee shall also maintain daily records of any downtime for the continuous organic monitoring device and recorder.

#### IV. Reporting Requirements

1. The permittee shall submit quarterly temperature deviation (excursion) reports that identify:
  - a. All 3-hour blocks of time during which the average temperature of the exhaust gases from the thermal incinerator does not comply with the temperature limitation specified in section A.II.3. of these terms and conditions;
  - b. All 3-hour blocks of time during which the average temperature of the desorption air stream prior to the VOC concentrator wheel does not comply with the temperature limitation specified in section A.II.4. of these terms and conditions; and
  - c. All 3-hour blocks of time during which the average temperature of the concentrated VOC laden air stream prior to the incinerator does not comply with the temperature limitation specified in section A.II.5. of these terms and conditions.

If no deviations occurred during a reporting period then the report submitted by the permittee shall state so. The permittee shall submit the reports to Hamilton County Department of Environmental Services. Refer to the General Terms and Conditions for the required quarterly report due dates.

2. The permittee shall submit quarterly deviation (excursion) reports which include the following information for the uncontrolled booth (B5) of R032:
  - a. An identification of each day during which a photochemically reactive material was employed and the average hourly organic compound emissions from all the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
  - b. An identification of each day during which a photochemically reactive material was employed and the organic compound emissions from all the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

If no deviations occurred during a reporting period then the report submitted by the permittee shall state so. The permittee shall submit the reports to Hamilton County Department of Environmental Services. Refer to the General Terms and Conditions for the required quarterly report due dates.

3. The permittee shall submit quarterly reports that identify all deviations (excursions) of the following emission limitations and operational restrictions:
  - a. The lbs per gallon OC content limits for coatings and cleanup materials in section A.I.2.a through A.I.2.c.;

**Modification Issued: 3/5/2002**

- b. The daily controlled and uncontrolled OC emissions limits for R031 and R032 combined in section A.I.1.;
- c. The daily coating and cleanup usage limits for R031 and R032 combined in section A.II.1.; and
- d. The daily overall control efficiency limitations in sections A.I.2.e. and A.I.2.f.

If no exceedances occurred during a reporting period then the report submitted by the permittee shall state so. The permittee shall submit the reports to Hamilton County Department of Environmental Services. Refer to the General Terms and Conditions for the required quarterly report due dates.

- 4. The permittee shall submit quarterly reports which specify the rolling, 12-month emissions and usages for R031 and R032 combined for each calendar month during the quarter. These reports shall include the following information for each calendar month:
  - a. The rolling, 12-month OC emissions, in tons, from the uncontrolled booths of R031 and R032 combined (A5 and B5, respectively);
  - b. The rolling, 12-month OC emissions, in tons, from the controlled booths of R031 and R032 combined (A1 through A4, A6 and B1 through B4, respectively);
  - c. The rolling, 12-month total (uncontrolled and controlled) OC emissions, in tons, from R031 and R032 combined;
  - d. The rolling, 12-month coating usage, in gallons, for the uncontrolled booths of R031 and R032 combined (A5 and B5, respectively);
  - e. The rolling, 12-month coating usage, in gallons, for the controlled booths of R031 and R032 combined (A1 through A4, A6 and B1 through B4, respectively);
  - f. The rolling, 12-month cleanup material usage, in gallons, for the uncontrolled booths of R031 and R032 combined (A5 and B5, respectively); and
  - g. The rolling, 12-month cleanup material usage, in gallons, for the controlled booths of R031 and R032 combined (A1 through A4, A6 and B1 through B4, respectively).

The permittee shall submit the reports to Hamilton County Department of Environmental Services. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and

October 31 of each year and shall cover the previous calendar quarters.

5. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing that any of the dry filters in the booths were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days after the event occurs.
6. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the 3-stage filters did not comply with the allowable range specified in section A.II.6 of these terms and conditions.

If no deviations occurred during a reporting period then the report submitted by the permittee shall state so. The permittee shall submit the reports to Hamilton County Department of Environmental Services. Refer to General Term and Condition A.1.c. for the required quarterly report due dates.

7. The permittee shall submit quarterly deviation reports that identify all periods of time during which the weekly inspections did not indicate a negative pressure differential between the exterior and interior of any spray booth in the coating line. The report shall also include an identification of the booth and the pressure differential reading.

If no deviations occurred during a reporting period then the report submitted by the permittee shall state so. The permittee shall submit the reports to Hamilton County Department of Environmental Services. Refer to the General Terms and Conditions for the required quarterly report due dates.

8. The permittee shall submit reports within 30 days following the end of each calendar quarter to the Hamilton County Department of Environmental Services documenting any periods where the concentration of organic compounds from the wheelhouse may indicate the performance of the concentrator has decreased. The report shall also include any continuous organic compound monitoring system downtime while the emissions unit was on-line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason and corrective action(s) taken for each time period of source and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall also be included in the quarterly report.

If there are no periods where the concentration of OC indicates the concentrator performance has decreased or there are no periods of monitor downtime during the calendar quarter, the permittee shall submit a statement to that effect. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

## V. Testing Requirements

**Modification Issued: 3/5/2002**

1. Compliance with the OC emissions limitations and usage restrictions in sections A.I. and A.II. shall be demonstrated by the recordkeeping requirements in section A.III. and the testing requirements in section A.V.2.
2. The permittee shall conduct, or have conducted, emission testing for emissions units R031 and R032 from emissions points within each coating line sufficient to determine compliance with the control requirements in sections A.I.2.e. and A.I.2.f. of these terms and conditions. The permittee shall conduct the emission testing in accordance with the following requirements:
  - a. The emission testing shall be conducted within 3 months after issuance of this permit and every 2.5 years thereafter.;
  - b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for organic compounds (85%) from R031 and R032, the overall control efficiency limitation for organic compounds from the heat-curing ovens associated with R031 and R032, and the control (destruction) efficiency limitation for organic compounds (90%) for the thermal incinerator associated with R031 and R032.
  - c. The test methods which the permittee must employ are specified in A.V.2.d. and A.V.2.e. below.
  - d. The capture efficiency shall be determined using methods 204 through 204F, as specified in 40 CFR 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with USEPA's "Guidelines for Determining Capture Efficiency", dated January 9, 1995.

The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.

- e. The control efficiency (i.e. the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or the approved alternative test protocol (e.g., the mass balance protocol approved on 10/25/95).

The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

**Modif**

Emissions Unit ID: R032

- f. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Hamilton County Department of Environmental Services.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Hamilton County Department of Environmental Services refusal to accept the results of the emission test(s).

**Modification Issued: 3/5/2002**

Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Hamilton County Department of Environmental Services.

3. Formulation data or USEPA method 24 shall be used to determine the OC contents of the coatings and cleanup materials.
4. Compliance with the particulate emission limitation in section A.I.1. of these terms and conditions shall be demonstrated by the following:

Emission limitation: 0.551 lb/hr of particulate emissions

Compliance Method:

Compliance with the particulate emission limit shall be determined in accordance with the following method:

To determine the actual worst case emission rate for particulate matter, the following equation shall be used:

$$E = \text{maximum coating solids usage rate (in pounds per hour)} \times (1-TE) \times (1-CE)$$

E = particulate matter emissions rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

5. Compliance with the visible particulate emissions limitation in section A.I.1. of these terms and conditions shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

**VI. Miscellaneous Requirements**

1. If probable cause exist indicating the source is causing or contributing to a nuisance in violation of Ohio Administrative Code rule 3475-15-07, the owner or operator of this emissions unit shall be required to submit and implement a control program which will bring this source into compliance.
2. Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous organic compound monitoring system designed to ensure continuous valid and representative readings of organic compounds. The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous organic compound monitoring system must be kept on site and available for inspection during regular office hours.

**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R032 - Plastics parts coating line with Zeolite wheel and thermal oxidizer (Torrid Line Booths B1 - B5)	None	None

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

47

Blackf

PTI A<sub>1</sub>

**Modification Issued: 3/5/2002**

Emissions Unit ID: R032

None