

Synthetic Minor Determination and/or **Netting Determination**

Permit To Install **14-05478**

A. Source Description

This facility was formerly known as Worthington Custom Plastics-Mason and before that as Hamilton Plastics. It is a custom mold shop operating over 30 plastic injection molding machines. The product line is almost exclusively automotive components and most of the throughput is shipped directly to automotive assembly plants. Product requiring protective and/or decorative coatings are spray painted in one or more of the facility's fifteen active booths.

B. Facility Emissions and Attainment Status

Actual facility VOC emissions are approximately 47 tons per year. Current allowable VOC emissions are over 200 TPY. Blackhawk is applying for this PTI to eliminate some unneeded flexibility, accept federally enforceable terms and conditions as a synthetic minor and thereby avoid MACT and RACT requirements. As a Title V facility Blackhawk was major for HAPs due to potential emissions from MEK and major for criteria pollutants because of the 200 ton per year allowable for VOC. The facility is located in Warren County which is nonattainment for ozone.

C. Source Emissions

Over 90 % of facility VOC emissions come from R031 and R032 which are two paint lines running parallel to each other with power wash preparation and bake oven cure. Emissions from eight of the ten spray booths on these lines, as well as some tunnel and oven emissions, are ducted to zeolite concentrating wheels and thermal incineration. Two of these booths and all the lesser used booths are uncontrolled.

D. Conclusion

This facility must maintain an extensive inventory of primers, colorcoats and clearcoats to accommodate their customers' wide range of requirements. They employ hundreds of different coatings annually and may employ a dozen at the same time. Due to the variety of materials on site the RACT and MACT standards would be particularly onerous to them. The permittee will maintain temperature records for the incinerator along with coating usage and VOC content records to demonstrate compliance with the permit limits. The facility will accept a facility wide limit of less than 100 tons per year of VOC emissions so the MACT and RACT requirements will not apply.

WARREN COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 14-05478 FOR AN AIR CONTAMINANT SOURCE FOR
BLACKHAWK AUTOMOTIVE PLASTICS INC**

On 11/13/2003 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Blackhawk Automotive Plastics Inc**, located at **4219 US Route 42, Mason, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 14-05478:

Modification of existing paint spray booths for painting plastic automotive parts.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Brad Miller, Hamilton County Department of Environmental Services, 250 William Howart Taft Pkwy,
Cincinnati, OH 45219-2660 [(513)946-7777]



**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 14-05478

Application Number: 14-05478
APS Premise Number: 1483090101
Permit Fee: **To be entered upon final issuance**
Name of Facility: Blackhawk Automotive Plastics Inc
Person to Contact: Bruce Tolson
Address: 4219 US Route 42
Mason, OH 450400000

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

Description of proposed emissions unit(s):
Modification of existing paint spray booths for painting plastic automotive parts.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

A. 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

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping 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 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. Records Retention Requirements

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.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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 verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction 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. 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 emissions unit(s) that is (are) served by such control system(s).

6. 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.

7. 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.

8. 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.

9. 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

Blackhawk Automotive Plastics Inc

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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.

10. 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.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. 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.

13. Source Operation and Operating Permit Requirements After Completion of Construction

- 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 ninety (90) days after commencing operation of the source(s) covered by this permit.

14. 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.

15. 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.

B. 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>
VOC	98.5
Single HAP	9.9
Combined HAPs	24.9

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
R004 - Non-metal parts paint spray booth	OAC rule 3745-31-05(A)(3)	See terms A.2.b, A.2.d, A.2.e, and A.2.h. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and OAC rule 3745-31-05(D).
	OAC rule 3745-21-07(G)(2)	See term A.2.c.
	OAC rule 3745-31-05(D)	See terms A.2.a and A.2.f.

2. Additional Terms and Conditions

- 2.a The total allowable volatile organic compound (VOC) emissions from all the plastic parts coating processes and associated cleaning, washoff and gluing processes located at this facility shall not exceed 98.5 TPY based on a rolling, 12-month summation. "Coating" means a protective, decorative, or functional material applied in a thin layer to a surface. Such materials include, but are not limited to, paints, topcoats, varnishes, sealers, stains, washcoats, basecoats, inks and temporary protective coatings. "Cleaning material" means organic solvent used to remove coating materials from equipment used in plastic parts manufacturing or coating operations. "Washoff material" means organic solvent used to remove coating from a substrate. "Gluing material" means any chemical substance that is applied for the purpose of bonding two surfaces together other than by mechanical means. "Volatile organic compound" means any volatile organic compound as defined in OAC

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rule 3745-21-01(B)(6).

- 2.b** The total VOC emissions (including cleanup material) from this emissions unit shall not exceed 2.0 tons per year.
- 2.c** On any day in which a photochemically reactive material (PRM) is employed in emissions unit R004, the volatile organic compound/organic compound (VOC) emissions shall not exceed 8 pounds per hour and 40 pounds per day (including cleaning material evaporated).
- 2.d** The VOC content of each coating and cleanup material employed in this emissions unit shall not exceed 5.0 pounds per gallon, based on a monthly volume weighted average.
- 2.e** The maximum annual usage of all coatings and cleanup materials shall not exceed 800 gallons, based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance upon issuance of the permit.

- 2.f** The allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance upon issuance of the permit.

- 2.g** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emissions limitations, usage and VOC content limitations and compliance with the air toxics policy.
- 2.h** The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the entire facility:

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- a. The name and identification number of each coating, employed;
- b. The individual Hazardous Air Pollutant (HAP)* content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
- c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)];
- d. The number of gallons of each coating employed;
- e. The name and identification of each cleaning, washoff and gluing material employed;
- f. The individual HAP content for each HAP of each cleaning, washoff and gluing material, in pounds of individual HAP per gallon of cleaning material, washoff and gluing material as applied;
- g. The total combined HAP content of each cleaning, washoff and gluing material, in pounds of combined HAPs per gallon of cleaning, washoff and gluing material, as applied [sum all the individual HAP contents from (f)];
- h. The number of gallons of each cleaning, washoff and gluing material employed;
- i. The total individual HAP emissions for each HAP from all coatings and cleaning, washoff and gluing materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleaning, washoff and gluing material];
- j. The total combined HAP emissions from all coatings and cleaning, washoff and gluing materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleaning, washoff and gluing material];
- k. The updated rolling, 12-month summation of emissions for each individual HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
- l. The updated rolling, 12-month summation of emissions for total combined HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

Monthly records shall be completed within 15 days following the end of each calendar month.

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

2. On any day in which a PRM is employed in this emissions unit the permittee shall maintain the following records for the day in which the PRM is employed:
 - a. The company identification for each coating and cleanup material employed;
 - b. The number of gallons of each coating and cleanup material employed;
 - c. The VOC content of each coating and cleanup material, in pounds per gallon;
 - d. For each day during which a photochemically reactive material is employed, the total VOC emission rate for all coatings and cleanup materials, in pounds per day (b x c);
 - e. For each day during which a photochemically reactive 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 is employed, the average hourly VOC emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

3. The permittee shall collect and record the following information on a monthly basis:
 - a. The name and identification of each coating and cleanup material employed;
 - b. The number of gallons of each coating and cleanup material employed;
 - c. The VOC content of each coating and cleanup material, in pounds per gallon;
 - d. The VOC emission rate [the summation of (b x c) for all coatings and cleanup materials employed];
 - e. The calendar year-to-date VOC emission rate (the summation of line d for all months during the calendar year); and

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- f. The calendar-year-to-date coating and cleanup material usage rates, in gallons.
4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
5. The permittee shall maintain for this facility all purchase orders and invoices of VOC-containing materials. The permittee shall retain such purchase orders and invoices for at least five years from their date of issuance. Upon request, the permittee shall make available to the Director of the Ohio EPA, or an authorized representative of the Director, such purchase orders and invoices for use in confirming the general accuracy of the records maintained and the reports submitted regarding material usage.
6. For each shipment of waste cleaning solvent sent to a solvent recycler, the permittee must obtain the following information:
 - a. The weight percent solids;
 - b. The weight percent water;
 - c. The density of waste material shipped;
 - d. The total gallons of waste material shipped;
 - e. The pounds of VOC per gallon;
 - f. The VOC credit in pounds VOC per shipment; and
 - g. Confirmation that the waste was received and will be reclaimed.

The permittee shall ensure that the pounds VOC per gallon, weight percent solids, weight percent water, and density of waste material are calculated by the solvent recycler using Method 24 in Appendix A, 40 CFR Part 60.

The permittee shall maintain at its plant copies of this information for five years after each shipment.

7. The permittee shall collect and record the following information each month from all the plastic parts coating processes and associated cleaning, washoff and gluing processes located at this facility for the purpose of demonstrating compliance with the annual VOC emission rate of 98.5 TPY VOC combined, based on a rolling 12-month summation:

- a. The name and identification number of each coating, cleaning, washoff and gluing material employed;
- b. The volume, in gallons, of each coating and cleaning, washoff and gluing material employed;
- c. The VOC content of each coating and cleaning, washoff and gluing material, in pounds of VOC per gallon, as applied;
- d. The amount of VOC emitted for all coating and cleaning, washoff and gluing materials employed, in pounds per month, (b x c);
- e. The rolling 12-month* usage for coating and cleaning, washoff and gluing materials, in gallons;
- f. The rolling 12-month* VOC emission rate in tons per year (in tons, rounded off to one decimal place); and
- g. Monthly records shall be completed within 15 days following the end of each calendar month.

*A rolling 12-month period includes the previous set of 12 calendar months.

The records shall be maintained for five years, and upon request the permittee shall submit such records to the appropriate Ohio EPA District Office or local air agency.

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8. The permittee shall maintain monthly records of the monthly volume weighted average VOC content of each coating and cleanup material employed in this emissions unit. This shall be calculated by dividing the monthly total VOC emissions from the emissions unit by the total number of gallons of coating and cleanup materials employed.

D. Reporting Requirements

1. The permittee shall submit quarterly written reports which identify any daily record when a PRM is employed in this emissions unit which shows an exceedance of the 8 pounds per hour and/or 40 pounds per day VOC emissions limits. The report shall include a copy of each such record along with the actual average hourly VOC emissions rate and the actual daily VOC emissions for each emissions unit in which the VOC emissions limits were exceeded.

The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by February 15, May 15, August 15, and November 15 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively) .

If no exceedances occurred during the reporting period, then a report is required stating so.

2. The permittee shall submit annual written reports which identify the total volatile organic compound emissions and the usage, in gallons, for all coatings and cleaning, washoff, and gluing materials employed during the reporting period for this emissions unit.

The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31 of each year and shall cover the previous twelve calendar months .

3. The permittee shall submit quarterly deviation reports which identify any exceedance of the HAP emission limitations set forth in term A.2.f.

The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by February 15, May 15, August 15, and November 15 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively) .

If no exceedances occurred, the permittee shall state so in the report.

4. If the facility has a rolling 12 month record that exceeds the 98.5 tons of VOC identified in term

A.2.a, the permittee shall submit the following:

- a. Within 30 days after the end of that rolling 12-month period in which the exceedance occurred, a notification to the appropriate Ohio EPA District Office or local air agency that the VOC emission limit was exceeded; and
 - b. Exceeding the 98.5 TPY VOC limit is a violation for each day of the last month of each 12 month period in which the 98.5TPY limit is exceeded regardless of whether a compliance plan is submitted.
5. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings and/or cleaning materials (i.e., VOC contents). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

E. Testing Requirements

1. OAC rule 3745-21-10(B) shall be used to determine the VOC contents of the coatings, cleaning, washoff and gluing materials employed in this emissions unit. If, pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating, cleaning, washoff or gluing material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

Method 24 or 24A can be performed by the permittee or other party (i.e., the permittee's coating, cleaning, washoff or gluing material supplier).

2. Compliance with the VOC emission limitations outlined in term A.2.a shall be demonstrated by the required record keeping in term C.7.
3. Compliance with the VOC emission limitations outlined in term A.2.b shall be demonstrated by the required record keeping in term C.3.
4. Compliance with the VOC emission limitation outlined in term A.2.d shall be demonstrated by the required record keeping in term C.3.
5. Compliance with the VOC emission limitation outlined in term A.2.e shall be demonstrated by the required record keeping in term C.3.

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6. Compliance with the HAP limitations outlined in term A.2.f shall be demonstrated by the record keeping in term C.1.
7. Compliance with the emission limitation outlined in term A.2.c shall be demonstrated by the record keeping in term C.2.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A., B., C., D., and E..

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2. Except as otherwise defined in the terms A thru E, the following terms have the following meanings:

"Average" in Terms A.2.d and C.8 shall mean total monthly pounds of VOC emissions divided by actual gallons of coatings and cleanup materials employed in that month;

"Employed" shall mean the use of coatings and/or cleaning solvent in a manner which contributes directly to emissions, but shall not include such use which is a part of a recycle or reuse process or procedure, except for actual emissions;

"PRM" shall mean any photochemically reactive material or substance containing a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5); and,

"Volatile organic compound" shall mean any volatile organic compound as defined in OAC rule 3745-21-01(B)(6).

3. The terms and conditions listed in this permit to install shall supercede all the air pollution control requirements contained in permit to install 14-1242 as issued on April 27, 1995.
4. This Federally Enforceable Permit limits the potential emissions of organic compounds from the plastic parts coating processes and associated cleaning, washoff and gluing processes located at this facility to no more than 98.5 TPY during any rolling 12-month period. Should VOC emissions from the plastic parts coating processes and associated cleaning, washing and gluing processes exceed 98.5 TPY during any rolling 12-month period, this facility should notify the Hamilton County Department of Environmental Services within 30 days.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
R013 - Non-metal parts paint spray booth	OAC rule 3745-31-05(A)(3)	See terms A.2.b, A.2.d, A.2.e, and A.2.h. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and OAC rule 3745-31-05(D).
	OAC rule 3745-21-07(G)(2)	See term A.2.c.
	OAC rule 3745-31-05(D)	See terms A.2.a and A.2.f.

2. Additional Terms and Conditions

- 2.a The total allowable volatile organic compound (VOC) emissions from all the plastic parts coating processes and associated cleaning, washoff and gluing processes located at this facility shall not exceed 98.5 TPY based on a rolling, 12-month summation. "Coating" means a protective, decorative, or functional material applied in a thin layer to a surface. Such materials include, but are not limited to, paints, topcoats, varnishes, sealers, stains, washcoats, basecoats, inks and temporary protective coatings. "Cleaning material" means organic solvent used to remove coating materials from equipment used in plastic parts manufacturing or coating operations. "Washoff material" means organic solvent used to remove coating from a substrate. "Gluing material" means any chemical substance that is applied for the purpose of bonding two surfaces together other than by mechanical means. "Volatile organic compound" means any volatile organic compound as defined in OAC

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rule 3745-21-01(B)(6).

- 2.b** The total VOC emissions (including cleanup material) from this emissions unit shall not exceed 6.5 tons per year.
- 2.c** On any day in which a photochemically reactive material (PRM) is employed in emissions unit R013, the volatile organic compound/organic compound (VOC) emissions shall not exceed 8 pounds per hour and 40 pounds per day (including cleaning material evaporated).
- 2.d** The VOC content of each coating and cleanup material employed in this emissions unit shall not exceed 2.0 pounds per gallon, based on a monthly volume weighted average.
- 2.e** The maximum annual usage of all coatings and cleanup materials shall not exceed 6500 gallons, based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance upon issuance of the permit.

- 2.f** The allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance upon issuance of the permit.

- 2.g** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emissions limitations, usage and VOC content limitations and compliance with the air toxics policy.
- 2.h** The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the entire facility:

- a. The name and identification number of each coating, employed;
- b. The individual Hazardous Air Pollutant (HAP)* content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
- c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)];
- d. The number of gallons of each coating employed;
- e. The name and identification of each cleaning, washoff and gluing material employed;
- f. The individual HAP content for each HAP of each cleaning, washoff and gluing material, in pounds of individual HAP per gallon of cleaning material, washoff and gluing material as applied;
- g. The total combined HAP content of each cleaning, washoff and gluing material, in pounds of combined HAPs per gallon of cleaning, washoff and gluing material, as applied [sum all the individual HAP contents from (f)];
- h. The number of gallons of each cleaning, washoff and gluing material employed;
- i. The total individual HAP emissions for each HAP from all coatings and cleaning, washoff and gluing materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleaning, washoff and gluing material];
- j. The total combined HAP emissions from all coatings and cleaning, washoff and gluing materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleaning, washoff and gluing material];
- k. The updated rolling, 12-month summation of emissions for each individual HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
- l. The updated rolling, 12-month summation of emissions for total combined HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

Monthly records shall be completed within 15 days following the end of each calendar month.

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* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

2. On any day in which a PRM is employed in this emissions unit the permittee shall maintain the following records for the day in which the PRM is employed:
 - a. The company identification for each coating and cleanup material employed;
 - b. The number of gallons of each coating and cleanup material employed;
 - c. The VOC content of each coating and cleanup material, in pounds per gallon;
 - d. For each day during which a photochemically reactive material is employed, the total VOC emission rate for all coatings and cleanup materials, in pounds per day (b x c);
 - e. For each day during which a photochemically reactive 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 is employed, the average hourly VOC emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

3. The permittee shall collect and record the following information on a monthly basis:
 - a. The name and identification of each coating and cleanup material employed;
 - b. The number of gallons of each coating and cleanup material employed;
 - c. The VOC content of each coating and cleanup material, in pounds per gallon;
 - d. The VOC emission rate [the summation of (b x c) for all coatings and cleanup materials employed];
 - e. The calendar year-to-date VOC emission rate (the summation of line d for all months during the calendar year); and

- f. The calendar-year-to-date coating and cleanup material usage rates, in gallons.
4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
5. The permittee shall maintain for this facility all purchase orders and invoices of VOC-containing materials. The permittee shall retain such purchase orders and invoices for at least five years from their date of issuance. Upon request, the permittee shall make available to the Director of the Ohio EPA, or an authorized representative of the Director, such purchase orders and invoices for use in confirming the general accuracy of the records maintained and the reports submitted regarding material usage.
6. For each shipment of waste cleaning solvent sent to a solvent reclaimer, the permittee must obtain the following information:
 - a. The weight percent solids;
 - b. The weight percent water;
 - c. The density of waste material shipped;
 - d. The total gallons of waste material shipped;
 - e. The pounds of VOC per gallon;
 - f. The VOC credit in pounds VOC per shipment; and,
 - g. Confirmation that the waste was received and will be reclaimed.

The permittee shall ensure that the pounds VOC per gallon, weight percent solids, weight percent water, and density of waste material are calculated by the solvent reclaimer using Method 24 in Appendix A, 40 CFR Part 60.

The permittee shall maintain at its plant copies of this information for five years after each shipment.

7. The permittee shall collect and record the following information each month from all the plastic parts coating processes and associated cleaning, washoff and gluing processes located at this facility for the purpose of demonstrating compliance with the annual VOC emission rate of 98.5 TPY VOC combined, based on a rolling 12-month summation:

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- a. The name and identification number of each coating, cleaning, washoff and gluing material employed;
- b. The volume, in gallons, of each coating and cleaning, washoff and gluing material employed;
- c. The VOC content of each coating and cleaning, washoff and gluing material, in pounds of VOC per gallon, as applied;
- d. The amount of VOC emitted for all coating and cleaning, washoff and gluing materials employed, in pounds per month, (b x c);
- e. The rolling 12-month* usage for coating and cleaning, washoff and gluing materials, in gallons;
- f. The rolling 12-month* VOC emission rate in tons per year (in tons, rounded off to one decimal place); and,
- g. Monthly records shall be completed within 15 days following the end of each calendar month.

*A rolling 12-month period includes the previous set of 12 calendar months.

The records shall be maintained for five years, and upon request the permittee shall submit such records to the appropriate Ohio EPA District Office or local air agency.

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8. The permittee shall maintain monthly records of the monthly volume weighted average VOC content of each coating and cleanup material employed in this emissions unit. This shall be calculated by dividing the monthly total VOC emissions from the emissions unit by the total number of gallons of coating and cleanup materials employed.

D. Reporting Requirements

1. The permittee shall submit quarterly written reports which identify any daily record when a PRM is employed in this emissions unit which shows an exceedance of the 8 pounds per hour and/or 40 pounds per day VOC emissions limits. The report shall include a copy of each such record along with the actual average hourly VOC emissions rate and the actual daily VOC emissions for each emissions unit in which the VOC emissions limits were exceeded.

The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by February 15, May 15, August 15, and November 15 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively) .

If no exceedances occurred during the reporting period, then a report is required stating so.

2. The permittee shall submit annual written reports which identify the total volatile organic compound emissions and the usage, in gallons, for all coatings and cleaning, washoff, and gluing materials employed during the reporting period for this emissions unit.

The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31 of each year and shall cover the previous twelve calendar months .

3. The permittee shall submit quarterly deviation reports which identify any exceedance of the HAP emission limitations set forth in term A.2.f.

The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by February 15, May 15, August 15, and November 15 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively) .

If no exceedances occurred, the permittee shall state so in the report.

4. If the facility has a rolling 12 month record that exceeds the 98.5 tons of VOC identified in term

A.2.a, the permittee shall submit the following:

- a. Within 30 days after the end of that rolling 12-month period in which the exceedance occurred, a notification to the appropriate Ohio EPA District Office or local air agency that the VOC emission limit was exceeded .
 - b. Exceeding the 98.5 TPY VOC limit is a violation for each day of the last month of each 12 month period in which the 98.5 TPY limit is exceeded regardless of whether a compliance plan is submitted.
5. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings and/or cleaning materials (i.e., VOC contents). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

E. Testing Requirements

1. OAC rule 3745-21-10(B) shall be used to determine the VOC contents of the coatings, cleaning, washoff and gluing materials employed in this emissions unit. If, pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating, cleaning, washoff or gluing material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

Method 24 or 24A can be performed by the permittee or other party (i.e., the permittee's coating, cleaning, washoff or gluing material supplier).
2. Compliance with the VOC emission limitations outlined in term A.2.a shall be demonstrated by the required record keeping in term C.7.
3. Compliance with the VOC emission limitations outlined in term A.2.b shall be demonstrated by the required record keeping in term C.3.
4. Compliance with the VOC emission limitation outlined in term A.2.d shall be demonstrated by the required record keeping in term C.3.
5. Compliance with the VOC emission limitation outlined in term A.2.e shall be demonstrated by the required record keeping in term C.3.

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6. Compliance with the HAP limitations outlined in term A.2.f shall be demonstrated by the record keeping in term C.1.
7. Compliance with the emission limitation outlined in term A.2.c shall be demonstrated by the record keeping in term C.2.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A., B., C., D., and E..

2. Except as otherwise defined in the terms A thru E, the following terms have the following meanings:

"Average" in Terms A.2.d and C.8 shall mean total monthly pounds of VOC emissions divided by actual gallons of coatings and cleanup materials employed in that month;

"Employed" shall mean the use of coatings and/or cleaning solvent in a manner which contributes directly to emissions, but shall not include such use which is a part of a recycle or reuse process or procedure, except for actual emissions;

"PRM" shall mean any photochemically reactive material or substance containing a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5); and,

"Volatile organic compound" shall mean any volatile organic compound as defined in OAC rule 3745-21-01(B)(6).

3. The terms and conditions listed in this permit to install shall supercede all the air pollution control requirements contained in permit to install 14-3148 as issued on February 28, 1996.
4. This Federally Enforceable Permit limits the potential emissions of organic compounds from the plastic parts coating processes and associated cleaning, washoff and gluing processes located at this facility to no more than 98.5 TPY during any rolling 12-month period. Should VOC emissions from the plastic parts coating processes and associated cleaning, washing and gluing processes exceed 98.5 TPY during any rolling 12-month period, this facility should notify the Hamilton County Department of Environmental Services within 30 days.

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PTI A

Emissions Unit ID: R014

Issued: To be entered upon final issuance

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
R014 - Non-metal parts paint spray booth	OAC rule 3745-31-05(A)(3)	See terms A.2.b, A.2.d, A.2.e, and A.2.h. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and OAC rule 3745-31-05(D).
	OAC rule 3745-21-07(G)(2)	See term A.2.c.
	OAC rule 3745-31-05(D)	See terms A.2.a and A.2.f.

2. Additional Terms and Conditions

- 2.a The total allowable volatile organic compound (VOC) emissions from all the plastic parts coating processes and associated cleaning, washoff and gluing processes located at this facility shall not exceed 98.5 TPY based on a rolling, 12-month summation. "Coating" means a protective, decorative, or functional material applied in a thin layer to a surface. Such materials include, but are not limited to, paints, topcoats, varnishes, sealers, stains, washcoats, basecoats, inks and temporary protective coatings. "Cleaning material" means organic solvent used to remove coating materials from equipment used in plastic parts manufacturing or coating operations. "Washoff material" means organic solvent used to remove coating from a substrate. "Gluing material" means any chemical substance that is applied for the purpose of bonding two surfaces together other than by mechanical means.

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"Volatile organic compound" means any volatile organic compound as defined in OAC rule 3745-21-01(B)(6).

- 2.b** The total VOC emissions (including cleanup material) from this emissions unit shall not exceed 6.5 tons per year.
- 2.c** On any day in which a photochemically reactive material (PRM) is employed in emissions unit R014, the volatile organic compound/organic compound (VOC) emissions shall not exceed 8 pounds per hour and 40 pounds per day (including cleaning material evaporated).
- 2.d** The VOC content of each coating and cleanup material employed in this emissions unit shall not exceed 2.0 pounds per gallon, based on a monthly volume weighted average.
- 2.e** The maximum annual usage of all coatings and cleanup materials shall not exceed 6500 gallons, based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance upon issuance of the permit.

- 2.f** The allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance upon issuance of the permit.

- 2.g** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emissions limitations, usage and VOC content limitations and compliance with the air toxics policy.
- 2.h** The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the entire facility:

- a. The name and identification number of each coating, employed;
- b. The individual Hazardous Air Pollutant (HAP)* content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
- c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)];
- d. The number of gallons of each coating employed;
- e. The name and identification of each cleaning, washoff and gluing material employed;
- f. The individual HAP content for each HAP of each cleaning, washoff and gluing material, in pounds of individual HAP per gallon of cleaning material, washoff and gluing material as applied;
- g. The total combined HAP content of each cleaning, washoff and gluing material, in pounds of combined HAPs per gallon of cleaning, washoff and gluing material, as applied [sum all the individual HAP contents from (f)];
- h. The number of gallons of each cleaning, washoff and gluing material employed;
- i. The total individual HAP emissions for each HAP from all coatings and cleaning, washoff and gluing materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleaning, washoff and gluing material];
- j. The total combined HAP emissions from all coatings and cleaning, washoff and gluing materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleaning, washoff and gluing material];
- k. The updated rolling, 12-month summation of emissions for each individual HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
- l. The updated rolling, 12-month summation of emissions for total combined HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

Monthly records shall be completed within 15 days following the end of each calendar month.

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* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

2. On any day in which a PRM is employed in this emissions unit the permittee shall maintain the following records for the day in which the PRM is employed:
 - a. The company identification for each coating and cleanup material employed;
 - b. The number of gallons of each coating and cleanup material employed;
 - c. The VOC content of each coating and cleanup material, in pounds per gallon;
 - d. For each day during which a photochemically reactive material is employed, the total VOC emission rate for all coatings and cleanup materials, in pounds per day (b x c);
 - e. For each day during which a photochemically reactive 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 is employed, the average hourly VOC emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

3. The permittee shall collect and record the following information on a monthly basis:
 - a. The name and identification of each coating and cleanup material employed;
 - b. The number of gallons of each coating and cleanup material employed;
 - c. The VOC content of each coating and cleanup material, in pounds per gallon;
 - d. The VOC emission rate [the summation of (b x c) for all coatings and cleanup materials employed];
 - e. The calendar year-to-date VOC emission rate (the summation of line d for all months

during the calendar year); and

- f. The calendar-year-to-date coating and cleanup material usage rates, in gallons.
4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
5. The permittee shall maintain for this facility all purchase orders and invoices of VOC-containing materials. The permittee shall retain such purchase orders and invoices for at least five years from their date of issuance. Upon request, the permittee shall make available to the Director of the Ohio EPA, or an authorized representative of the Director, such purchase orders and invoices for use in confirming the general accuracy of the records maintained and the reports submitted regarding material usage.
6. For each shipment of waste cleaning solvent sent to a solvent reclaimer, the permittee must obtain the following information:
 - a. The weight percent solids;
 - b. The weight percent water;
 - c. The density of waste material shipped;
 - d. The total gallons of waste material shipped;
 - e. The pounds of VOC per gallon;
 - f. The VOC credit in pounds VOC per shipment; and
 - g. Confirmation that the waste was received and will be reclaimed.

The permittee shall ensure that the pounds VOC per gallon, weight percent solids, weight percent water, and density of waste material are calculated by the solvent reclaimer using Method 24 in Appendix A, 40 CFR Part 60.

The permittee shall maintain at its plant copies of this information for five years after each shipment.

7. The permittee shall collect and record the following information each month from all the plastic parts coating processes and associated cleaning, washoff and gluing processes located at this facility for the purpose of demonstrating compliance with the annual VOC emission rate of 98.5 TPY VOC combined, based on a rolling 12-month summation:

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- a. The name and identification number of each coating, cleaning, washoff and gluing material employed;
- b. The volume, in gallons, of each coating and cleaning, washoff and gluing material employed;
- c. The VOC content of each coating and cleaning, washoff and gluing material, in pounds of VOC per gallon, as applied;
- d. The amount of VOC emitted for all coating and cleaning, washoff and gluing materials employed, in pounds per month, (b x c);
- e. The rolling 12-month* usage for coating and cleaning, washoff and gluing materials, in gallons;
- f. The rolling 12-month* VOC emission rate in tons per year (in tons, rounded off to one decimal place); and
- g. Monthly records shall be completed within 15 days following the end of each calendar month.

*A rolling 12-month period includes the previous set of 12 calendar months.

The records shall be maintained for five years, and upon request the permittee shall submit such records to the appropriate Ohio EPA District Office or local air agency.

8. The permittee shall maintain monthly records of the monthly volume weighted average VOC content of each coating and cleanup material employed in this emissions unit. This shall be calculated by dividing the monthly total VOC emissions from the emissions unit by the total number of gallons of coating and cleanup materials employed.

D. Reporting Requirements

1. The permittee shall submit quarterly written reports which identify any daily record when a PRM is employed in this emissions unit which shows an exceedance of the 8 pounds per hour and/or 40 pounds per day VOC emissions limits. The report shall include a copy of each such record along with the actual average hourly VOC emissions rate and the actual daily VOC emissions for each emissions unit in which the VOC emissions limits were exceeded.

The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by February 15, May 15, August 15, and November 15 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively) .

If no exceedances occurred during the reporting period, then a report is required stating so.

2. The permittee shall submit annual written reports which identify the total volatile organic compound emissions and the usage, in gallons, for all coatings and cleaning, washoff, and gluing materials employed during the reporting period for this emissions unit.

The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31 of each year and shall cover the previous twelve calendar months .

3. The permittee shall submit quarterly deviation reports which identify any exceedance of the HAP emission limitations set forth in term A.2.f.

The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by February 15, May 15, August 15, and November 15 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively) .

If no exceedances occurred, the permittee shall state so in the report.

4. If the facility has a rolling 12 month record that exceeds the 98.5 tons of VOC identified in term A.2.a, the permittee shall submit the following:

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- a. Within 30 days after the end of that rolling 12-month period in which the exceedance occurred, a notification to the appropriate Ohio EPA District Office or local air agency that the VOC emission limit was exceeded; and
 - b. Exceeding the 98.5 TPY VOC limit is a violation for each day of the last month of each 12 month period in which the 98.5 TPY limit is exceeded regardless of whether a compliance plan is submitted.
5. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings and/or cleaning materials (i.e., VOC contents). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

E. Testing Requirements

1. OAC rule 3745-21-10(B) shall be used to determine the VOC contents of the coatings, cleaning, washoff and gluing materials employed in this emissions unit. If, pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating, cleaning, washoff or gluing material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

Method 24 or 24A can be performed by the permittee or other party (i.e., the permittee's coating, cleaning, washoff or gluing material supplier).
2. Compliance with the VOC emission limitations outlined in term A.2.a shall be demonstrated by the required record keeping in term C.7.
3. Compliance with the VOC emission limitations outlined in term A.2.b shall be demonstrated by the required record keeping in term C.3.
4. Compliance with the VOC emission limitation outlined in term A.2.d shall be demonstrated by the required record keeping in term C.3.
5. Compliance with the VOC emission limitation outlined in term A.2.e shall be demonstrated by the required record keeping in term C.3.

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6. Compliance with the HAP limitations outlined in term A.2.f shall be demonstrated by the record keeping in term C.1.
7. Compliance with the emission limitation outlined in term A.2.c shall be demonstrated by the record keeping in term C.2.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A., B., C., D., and E..

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Issued: To be entered upon final issuance

2. Except as otherwise defined in the terms A thru E, the following terms have the following meanings:

"Average" in Terms A.2.d and C.8 shall mean total monthly pounds of VOC emissions divided by actual gallons of coatings and cleanup materials employed in that month;

"Employed" shall mean the use of coatings and/or cleaning solvent in a manner which contributes directly to emissions, but shall not include such use which is a part of a recycle or reuse process or procedure, except for actual emissions;

"PRM" shall mean any photochemically reactive material or substance containing a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5); and

"Volatile organic compound" shall mean any volatile organic compound as defined in OAC rule 3745-21-01(B)(6).

3. The terms and conditions listed in this permit to install shall supercede all the air pollution control requirements contained in permit to install 14-3148 as issued on February 28, 1996.
4. This Federally Enforceable Permit limits the potential emissions of organic compounds from the plastic parts coating processes and associated cleaning, washoff and gluing processes located at this facility to no more than 98.5 TPY during any rolling 12-month period. Should VOC emissions from the plastic parts coating processes and associated cleaning, washing and gluing processes exceed 98.5 TPY during any rolling 12-month period, this facility should notify the Hamilton County Department of Environmental Services within 30 days.

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PTI A

Emissions Unit ID: R019

Issued: To be entered upon final issuance

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
R019 - Non-metal parts paint spray booth	OAC rule 3745-31-05(A)(3)	See terms A.2.b, A.2.d, A.2.e, and A.2.h.
	OAC rule 3745-21-07(G)(2)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and OAC rule 3745-31-05(D).
	OAC rule 3745-31-05(D)	See term A.2.c
		See terms A.2.a and A.2.f

2. Additional Terms and Conditions

- 2.a The total allowable volatile organic compound (VOC) emissions from all the plastic parts coating processes and associated cleaning, washoff and gluing processes located at this facility shall not exceed 98.5 TPY based on a rolling, 12-month summation. "Coating" means a protective, decorative, or functional material applied in a thin layer to a surface. Such materials include, but are not limited to, paints, topcoats, varnishes, sealers, stains, washcoats, basecoats, inks and temporary protective coatings. "Cleaning material" means organic solvent used to remove coating materials from equipment used in plastic parts manufacturing or coating operations. "Washoff material" means organic solvent used to remove coating from a substrate. "Gluing material" means any chemical substance that is applied for the purpose of bonding two surfaces together other than by mechanical means.

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"Volatile organic compound" means any volatile organic compound as defined in OAC rule 3745-21-01(B)(6).

- 2.b** The total VOC emissions (including cleanup material) from this emissions unit shall not exceed 1.5 tons per year.
- 2.c** On any day in which a photochemically reactive material (PRM) is employed in emissions unit R019, the volatile organic compound/organic compound (VOC) emissions shall not exceed 8 pounds per hour and 40 pounds per day (including cleaning material evaporated).
- 2.d** The VOC content of each coating and cleanup material employed in this emissions unit shall not exceed 5.0 pounds per gallon, based on a monthly volume weighted average.
- 2.e** The maximum annual usage of all coatings and cleanup materials shall not exceed 600 gallons, based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance upon issuance of the permit.

- 2.f** The allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance upon issuance of the permit.

- 2.g** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emissions limitations, usage and VOC content limitations and compliance with the air toxics policy.
- 2.h** The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the entire facility:

- a. The name and identification number of each coating, employed;
- b. The individual Hazardous Air Pollutant (HAP)* content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
- c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)];
- d. The number of gallons of each coating employed;
- e. The name and identification of each cleaning, washoff and gluing material employed;
- f. The individual HAP content for each HAP of each cleaning, washoff and gluing material, in pounds of individual HAP per gallon of cleaning material, washoff and gluing material as applied;
- g. The total combined HAP content of each cleaning, washoff and gluing material, in pounds of combined HAPs per gallon of cleaning, washoff and gluing material, as applied [sum all the individual HAP contents from (f)];
- h. The number of gallons of each cleaning, washoff and gluing material employed;
- i. The total individual HAP emissions for each HAP from all coatings and cleaning, washoff and gluing materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleaning, washoff and gluing material];
- j. The total combined HAP emissions from all coatings and cleaning, washoff and gluing materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleaning, washoff and gluing material];
- k. The updated rolling, 12-month summation of emissions for each individual HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
- l. The updated rolling, 12-month summation of emissions for total combined HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

Monthly records shall be completed within 15 days following the end of each calendar month.

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* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

2. On any day in which a PRM is employed in this emissions unit the permittee shall maintain the following records for the day in which the PRM is employed:
 - a. The company identification for each coating and cleanup material employed;
 - b. The number of gallons of each coating and cleanup material employed;
 - c. The VOC content of each coating and cleanup material, in pounds per gallon;
 - d. For each day during which a photochemically reactive material is employed, the total VOC emission rate for all coatings and cleanup materials, in pounds per day (b x c);
 - e. For each day during which a photochemically reactive 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 is employed, the average hourly VOC emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

3. The permittee shall collect and record the following information on a monthly basis:
 - a. The name and identification of each coating and cleanup material employed;
 - b. The number of gallons of each coating and cleanup material employed;
 - c. The VOC content of each coating and cleanup material, in pounds per gallon;
 - d. The VOC emission rate [the summation of (b x c) for all coatings and cleanup materials employed];
 - e. The calendar year-to-date VOC emission rate (the summation of line d for all months

during the calendar year); and

- f. The calendar-year-to-date coating and cleanup material usage rates, in gallons.
4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
5. The permittee shall maintain for this facility all purchase orders and invoices of VOC-containing materials. The permittee shall retain such purchase orders and invoices for at least five years from their date of issuance. Upon request, the permittee shall make available to the Director of the Ohio EPA, or an authorized representative of the Director, such purchase orders and invoices for use in confirming the general accuracy of the records maintained and the reports submitted regarding material usage.
6. For each shipment of waste cleaning solvent sent to a solvent recycler, the permittee must obtain the following information:
 - a. The weight percent solids;
 - b. The weight percent water;
 - c. The density of waste material shipped;
 - d. The total gallons of waste material shipped;
 - e. The pounds of VOC per gallon;
 - f. The VOC credit in pounds VOC per shipment; and
 - g. Confirmation that the waste was received and will be reclaimed.

The permittee shall ensure that the pounds VOC per gallon, weight percent solids, weight percent water, and density of waste material are calculated by the solvent recycler using Method 24 in Appendix A, 40 CFR Part 60.

The permittee shall maintain at its plant copies of this information for five years after each shipment.

7. The permittee shall collect and record the following information each month from all the plastic parts coating processes and associated cleaning, washoff and gluing processes located at this facility for the purpose of demonstrating compliance with the annual VOC emission rate of 98.5 TPY VOC combined, based on a rolling 12-month summation:

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- a. The name and identification number of each coating, cleaning, washoff and gluing material employed;
- b. The volume, in gallons, of each coating and cleaning, washoff and gluing material employed;
- c. The VOC content of each coating and cleaning, washoff and gluing material, in pounds of VOC per gallon, as applied;
- d. The amount of VOC emitted for all coating and cleaning, washoff and gluing materials employed, in pounds per month, (b x c);
- e. The rolling 12-month* usage for coating and cleaning, washoff and gluing materials, in gallons;
- f. The rolling 12-month* VOC emission rate in tons per year (in tons, rounded off to one decimal place); and
- g. Monthly records shall be completed within 15 days following the end of each calendar month.

*A rolling 12-month period includes the previous set of 12 calendar months.

The records shall be maintained for five years, and upon request the permittee shall submit such records to the appropriate Ohio EPA District Office or local air agency.

8. The permittee shall maintain monthly records of the monthly volume weighted average VOC content of each coating and cleanup material employed in this emissions unit. This shall be calculated by dividing the monthly total VOC emissions from the emissions unit by the total number of gallons of coating and cleanup materials employed.

D. Reporting Requirements

1. The permittee shall submit quarterly written reports which identify any daily record when a PRM is employed in this emissions unit which shows an exceedance of the 8 pounds per hour and/or 40 pounds per day VOC emissions limits. The report shall include a copy of each such record along with the actual average hourly VOC emissions rate and the actual daily VOC emissions for each emissions unit in which the VOC emissions limits were exceeded.

The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by February 15, May 15, August 15, and November 15 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively) .

If no exceedances occurred during the reporting period, then a report is required stating so.

2. The permittee shall submit annual written reports which identify the total volatile organic compound emissions and the usage, in gallons, for all coatings and cleaning, washoff, and gluing materials employed during the reporting period for this emissions unit.

The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31 of each year and shall cover the previous twelve calendar months .

3. The permittee shall submit quarterly deviation reports which identify any exceedance of the HAP emission limitations set forth in term A.2.f.

The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by February 15, May 15, August 15, and November 15 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively) .

If no exceedances occurred, the permittee shall state so in the report.

4. If the facility has a rolling 12 month record that exceeds the 98.5 tons of VOC identified in term A.2.a, the permittee shall submit the following:

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- a. Within 30 days after the end of that rolling 12-month period in which the exceedance occurred, a notification to the appropriate Ohio EPA District Office or local air agency that the VOC emission limit was exceeded; and
 - b. Exceeding the 98.5 TPY VOC limit is a violation for each day of the last month of each 12 month period in which the 98.5 TPY limit is exceeded regardless of whether a compliance plan is submitted.
5. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings and/or cleaning materials (i.e., VOC contents). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

E. Testing Requirements

1. OAC rule 3745-21-10(B) shall be used to determine the VOC contents of the coatings, cleaning, washoff and gluing materials employed in this emissions unit. If, pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating, cleaning, washoff or gluing material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

Method 24 or 24A can be performed by the permittee or other party (i.e., the permittee's coating, cleaning, washoff or gluing material supplier).

2. Compliance with the VOC emission limitations outlined in term A.2.a shall be demonstrated by the required recordkeeping in term C.7.
3. Compliance with the VOC emission limitations outlined in term A.2.b shall be demonstrated by the required record keeping in term C.3.
4. Compliance with the VOC emission limitation outlined in term A.2.d shall be demonstrated by the required record keeping in term C.3.
5. Compliance with the VOC emission limitation outlined in term A.2.e shall be demonstrated by the required record keeping in term C.3.

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6. Compliance with the HAP limitations outlined in term A.2.f shall be demonstrated by the record keeping in term C.1.
7. Compliance with the emission limitation outlined in term A.2.c shall be demonstrated by the record keeping in term C.2.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A., B., C., D., and E..

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2. Except as otherwise defined in the terms A thru E, the following terms have the following meanings:

"Average" in Terms A.2.d and C.8 shall mean total monthly pounds of VOC emissions divided by actual gallons of coatings and cleanup materials employed in that month;

"Employed" shall mean the use of coatings and/or cleaning solvent in a manner which contributes directly to emissions, but shall not include such use which is a part of a recycle or reuse process or procedure, except for actual emissions;

"PRM" shall mean any photochemically reactive material or substance containing a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5); and

"Volatile organic compound" shall mean any volatile organic compound as defined in OAC rule 3745-21-01(B)(6).

3. The terms and conditions listed in this permit to install shall supercede all the air pollution control requirements contained in permit to install 14-3853 as issued on January 31, 1996.
4. This Federally Enforceable Permit limits the potential emissions of organic compounds from the plastic parts coating processes and associated cleaning, washoff and gluing processes located at this facility to no more than 98.5 TPY during any rolling 12-month period. Should VOC emissions from the plastic parts coating processes and associated cleaning, washing and gluing processes exceed 98.5 TPY during any rolling 12-month period, this facility should notify the Hamilton County Department of Environmental Services within 30 days.

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
R020 - Non-metal parts paint spray booth	OAC rule 3745-31-05(A)(3)	See terms A.2.b, A.2.d, A.2.e, and A.2.h. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and OAC rule 3745-31-05(D).
	OAC rule 3745-21-07(G)(2)	See term A.2.c.
	OAC rule 3745-31-05(D)	See terms A.2.a and A.2.f.

2. Additional Terms and Conditions

- 2.a The total allowable volatile organic compound (VOC) emissions from all the plastic parts coating processes and associated cleaning, washoff and gluing processes located at this facility shall not exceed 98.5 TPY based on a rolling, 12-month summation. "Coating" means a protective, decorative, or functional material applied in a thin layer to a surface. Such materials include, but are not limited to, paints, topcoats, varnishes, sealers, stains, washcoats, basecoats, inks and temporary protective coatings. "Cleaning material" means organic solvent used to remove coating materials from equipment used in plastic parts manufacturing or coating operations. "Washoff material" means organic solvent used to remove coating from a substrate. "Gluing material" means any chemical substance that is applied for the purpose of bonding two surfaces together other than by mechanical means.

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"Volatile organic compound" means any volatile organic compound as defined in OAC rule 3745-21-01(B)(6).

- 2.b** The total VOC emissions (including cleanup material) from this emissions unit shall not exceed 1.5 tons per year.
- 2.c** On any day in which a photochemically reactive material (PRM) is employed in emissions unit R020, the volatile organic compound/organic compound (VOC) emissions shall not exceed 8 pounds per hour and 40 pounds per day (including cleaning material evaporated).
- 2.d** The VOC content of each coating and cleanup material employed in this emissions unit shall not exceed 5.0 pounds per gallon, based on a monthly volume weighted average.
- 2.e** The maximum annual usage of all coatings and cleanup materials shall not exceed 600 gallons, based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance upon issuance of the permit.

- 2.f** The allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on a rolling, 12-month summation.

The permittee has existing records to demonstrate compliance upon issuance of the permit.

- 2.g** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emissions limitations, usage and VOC content limitations and compliance with the air toxics policy.
- 2.h** The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

B. Operational Restrictions

None

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each month for the entire facility:

- a. The name and identification number of each coating, employed;
- b. The individual Hazardous Air Pollutant (HAP)* content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
- c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)];
- d. The number of gallons of each coating employed;
- e. The name and identification of each cleaning, washoff and gluing material employed;
- f. The individual HAP content for each HAP of each cleaning, washoff and gluing material, in pounds of individual HAP per gallon of cleaning material, washoff and gluing material as applied;
- g. The total combined HAP content of each cleaning, washoff and gluing material, in pounds of combined HAPs per gallon of cleaning, washoff and gluing material, as applied [sum all the individual HAP contents from (f)];
- h. The number of gallons of each cleaning, washoff and gluing material employed;
- i. The total individual HAP emissions for each HAP from all coatings and cleaning, washoff and gluing materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleaning, washoff and gluing material];
- j. The total combined HAP emissions from all coatings and cleaning, washoff and gluing materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleaning, washoff and gluing material];
- k. The updated rolling, 12-month summation of emissions for each individual HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
- l. The updated rolling, 12-month summation of emissions for total combined HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

Monthly records shall be completed within 15 days following the end of each calendar month.

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* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

2. On any day in which a PRM is employed in this emissions unit the permittee shall maintain the following records for the day in which the PRM is employed:
 - a. The company identification for each coating and cleanup material employed;
 - b. The number of gallons of each coating and cleanup material employed;
 - c. The VOC content of each coating and cleanup material, in pounds per gallon;
 - d. For each day during which a photochemically reactive material is employed, the total VOC emission rate for all coatings and cleanup materials, in pounds per day (b x c);
 - e. For each day during which a photochemically reactive 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 is employed, the average hourly VOC emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

3. The permittee shall collect and record the following information on a monthly basis:
 - a. The name and identification of each coating and cleanup material employed;
 - b. The number of gallons of each coating and cleanup material employed;
 - c. The VOC content of each coating and cleanup material, in pounds per gallon;
 - d. The VOC emission rate [the summation of (b x c) for all coatings and cleanup materials employed];
 - e. The calendar year-to-date VOC emission rate (the summation of line d for all months

during the calendar year); and

- f. The calendar-year-to-date coating and cleanup material usage rates, in gallons.
4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
5. The permittee shall maintain for this facility all purchase orders and invoices of VOC-containing materials. The permittee shall retain such purchase orders and invoices for at least five years from their date of issuance. Upon request, the permittee shall make available to the Director of the Ohio EPA, or an authorized representative of the Director, such purchase orders and invoices for use in confirming the general accuracy of the records maintained and the reports submitted regarding material usage.
6. For each shipment of waste cleaning solvent sent to a solvent reclaimer, the permittee must obtain the following information:
 - a. The weight percent solids;
 - b. The weight percent water;
 - c. The density of waste material shipped;
 - d. The total gallons of waste material shipped;
 - e. The pounds of VOC per gallon;
 - f. The VOC credit in pounds VOC per shipment; and
 - g. Confirmation that the waste was received and will be reclaimed.

The permittee shall ensure that the pounds VOC per gallon, weight percent solids, weight percent water, and density of waste material are calculated by the solvent reclaimer using Method 24 in Appendix A, 40 CFR Part 60.

The permittee shall maintain at its plant copies of this information for five years after each shipment.

7. The permittee shall collect and record the following information each month from all the plastic parts coating processes and associated cleaning, washoff and gluing processes located at this facility for the purpose of demonstrating compliance with the annual VOC emission rate of 98.5 TPY VOC combined, based on a rolling 12-month summation:

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- a. The name and identification number of each coating, cleaning, washoff and gluing material employed;
- b. The volume, in gallons, of each coating and cleaning, washoff and gluing material employed;
- c. The VOC content of each coating and cleaning, washoff and gluing material, in pounds of VOC per gallon, as applied;
- d. The amount of VOC emitted for all coating and cleaning, washoff and gluing materials employed, in pounds per month, (b x c);
- e. The rolling 12-month* usage for coating and cleaning, washoff and gluing materials, in gallons;
- f. The rolling 12-month* VOC emission rate in tons per year (in tons, rounded off to one decimal place); and
- g. Monthly records shall be completed within 15 days following the end of each calendar month.

*A rolling 12-month period includes the previous set of 12 calendar months.

The records shall be maintained for five years, and upon request the permittee shall submit such records to the appropriate Ohio EPA District Office or local air agency.

8. The permittee shall maintain monthly records of the monthly volume weighted average VOC content of each coating and cleanup material employed in this emissions unit. This shall be calculated by dividing the monthly total VOC emissions from the emissions unit by the total number of gallons of coating and cleanup materials employed.

D. Reporting Requirements

1. The permittee shall submit quarterly written reports which identify any daily record when a PRM is employed in this emissions unit which shows an exceedance of the 8 pounds per hour and/or 40 pounds per day VOC emissions limits. The report shall include a copy of each such record along with the actual average hourly VOC emissions rate and the actual daily VOC emissions for each emissions unit in which the VOC emissions limits were exceeded.

The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by February 15, May 15, August 15, and November 15 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively) .

If no exceedances occurred during the reporting period, then a report is required stating so.

2. The permittee shall submit annual written reports which identify the total volatile organic compound emissions and the usage, in gallons, for all coatings and cleaning, washoff, and gluing materials employed during the reporting period for this emissions unit.

The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31 of each year and shall cover the previous twelve calendar months .

3. The permittee shall submit quarterly deviation reports which identify any exceedance of the HAP emission limitations set forth in term A.2.f.

The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by February 15, May 15, August 15, and November 15 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively) .

If no exceedances occurred, the permittee shall state so in the report.

4. If the facility has a rolling 12 month record that exceeds the 98.5 tons of VOC identified in term A.2.a, the permittee shall submit the following:

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- a. Within 30 days after the end of that rolling 12-month period in which the exceedance occurred, a notification to the appropriate Ohio EPA District Office or local air agency that the VOC emission limit was exceeded; and
 - b. Exceeding the 98.5 TPY VOC limit is a violation for each day of the last month of each 12 month period in which the 98.5 TPY limit is exceeded regardless of whether a compliance plan is submitted.
5. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings and/or cleaning materials (i.e., VOC contents). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

E. Testing Requirements

1. OAC rule 3745-21-10(B) shall be used to determine the VOC contents of the coatings, cleaning, washoff and gluing materials employed in this emissions unit. If, pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating, cleaning, washoff or gluing material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

Method 24 or 24A can be performed by the permittee or other party (i.e., the permittee's coating, cleaning, washoff or gluing material supplier).
2. Compliance with the VOC emission limitations outlined in term A.2.a shall be demonstrated by the required record keeping in term C.7.
3. Compliance with the VOC emission limitations outlined in term A.2.b shall be demonstrated by the required record keeping in term C.3.
4. Compliance with the VOC emission limitation outlined in term A.2.d shall be demonstrated by the required record keeping in term C.3.
5. Compliance with the VOC emission limitation outlined in term A.2.e shall be demonstrated by the required record keeping in term C.3.

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6. Compliance with the HAP limitations outlined in term A.2.f shall be demonstrated by the record keeping in term C.1.
7. Compliance with the emission limitation outlined in term A.2.c shall be demonstrated by the record keeping in term C.2.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A., B., C., D., and E..

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Issued: To be entered upon final issuance

2. Except as otherwise defined in the terms A thru E, the following terms have the following meanings:

"Average" in Terms A.2.d and C.8 shall mean total monthly pounds of VOC emissions divided by actual gallons of coatings and cleanup materials employed in that month;

"Employed" shall mean the use of coatings and/or cleaning solvent in a manner which contributes directly to emissions, but shall not include such use which is a part of a recycle or reuse process or procedure, except for actual emissions;

"PRM" shall mean any photochemically reactive material or substance containing a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5); and

"Volatile organic compound" shall mean any volatile organic compound as defined in OAC rule 3745-21-01(B)(6).

3. The terms and conditions listed in this permit to install shall supercede all the air pollution control requirements contained in permit to install 14-3853 as issued on January 31, 1996.
4. This Federally Enforceable Permit limits the potential emissions of organic compounds from the plastic parts coating processes and associated cleaning, washoff and gluing processes located at this facility to no more than 98.5 TPY during any rolling 12-month period. Should VOC emissions from the plastic parts coating processes and associated cleaning, washing and gluing processes exceed 98.5 TPY during any rolling 12-month period, this facility should notify the Hamilton County Department of Environmental Services within 30 days.

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PTI A

Emissions Unit ID: R031

Issued: To be entered upon final issuance

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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 - Torrid Line A with Thermal Incinerator	OAC rule 3745-31-05(A)(3)
	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)

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Emissions Unit ID: **R031**

Issued: To be entered upon final issuance

<u>Applicable Emissions Limitations/Control Measures</u>	
470 lbs/day of VOC (including cleanup) from the controlled booths of R031 and R032 combined (A1-A4, A6 and B1-B4);	12-month summation from all of the booths of R031 and R032 combined. See terms A.2.i, A.2.j and B.2. See term A.2.e.
420 lbs/day of VOC (including cleanup) from the uncontrolled booths of R031 and R032 combined (A5 and B5);	See terms A.2.d and A.2.f
See terms A.2.a. through A.2.c and B.1.	See term A.2.g.
The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(1), 3745-21-07(G)(2), 3745-21-07(G)(6), and OAC rule 3745-31-05(D).	
46.7 TPY of VOC (excluding cleanup), based upon a rolling, 12-month summation from the controlled booths of R031 and R032 combined (A1-A4, A6 and B1-B4);	
33.8 TPY of VOC (excluding cleanup), based upon a rolling, 12-month summation from the uncontrolled booths of R031 and R032 combined (A5 and B5);	
80.5 TPY VOC (including cleanup), based upon a rolling,	

2. Additional Terms and Conditions

- 2.a** The VOC 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 VOC per gallon of coating, based upon a daily volume-weighted average of the VOC content.
- 2.b** The VOC content of each coating employed in the uncontrolled booths of R031 and R032 (A5 and B5, respectively) shall not exceed 5.0 pounds of VOC per gallon of coating.
- 2.c** The VOC 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 VOC per gallon of cleanup material.
- 2.d** On any day in which a photochemically reactive material (PRM) is employed in an uncontrolled booth (A5 or B5) the volatile organic compound/organic compound (VOC) emissions shall not exceed 8 pounds per hour and 40 pounds per day (including cleaning material evaporated).
- 2.e** The VOC emissions from the oven associated with emissions unit 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 emissions unit R031 and booths B1 through B4 and the oven associated with emissions unit R032 to the thermal oxidizer.

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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.

- 2.g** 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.h** 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.1. through A.2.j, compliance with the Operational Restrictions in Terms B.1 through B.7 and the use of a control device with an overall control efficiency equal to or greater than 85%.
- 2.i** The total allowable volatile organic compound (VOC) emissions from all the plastic parts coating processes and associated cleaning, washoff and gluing processes located at this facility shall not exceed 98.5 TPY based on a rolling, 12-month summation. "Coating" means a protective, decorative, or functional material applied in a thin layer to a surface. Such materials include, but are not limited to, paints, topcoats, varnishes, sealers, stains, washcoats, basecoats, inks and temporary protective coatings. "Cleaning material" means organic solvent used to remove coating materials from equipment used in plastic parts manufacturing or coating operations. "Washoff material" means organic solvent used to remove coating from a substrate. "Gluing material" means any chemical substance that is applied for the purpose of bonding two surfaces together other than by mechanical means. "Volatile organic compound" means any volatile organic compound as defined in OAC rule 3745-21-01(B)(6).
- 2.j** The allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on a rolling, 12-month summation.

B. Operational Restrictions

- 1. The daily coating and cleanup material usage limitations for units R031 and R032 combined shall not exceed the following:

 - a. 80 gallons of coatings, for coatings employed in the uncontrolled booths of R031 and

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R032 (A5 and B5, respectively);

- b. 587 gallons of coatings, for coatings employed in the controlled booths of R031 and R032 (A1 - A4, A.6 and B1- B4, respectively);

- c. 3 gallons of cleanup materials, for cleanup materials employed in the uncontrolled booths of R031 and R032 (A5 and B5, respectively); and
 - d. 12 gallons of cleanup materials, for cleanup materials employed in the controlled booths of R031 and R032 (A1- A4, A.6 and B1- B4, respectively).
 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. 119,744 gallons per year of coatings and cleanup materials employed in the controlled booths (A1-A4, A6 and B1-B4); and
 - b. 13,520 gallons per year of coatings and 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 or the temperature established during the most recent emissions test that demonstrated compliance with the applicable VOC emission limitations.
 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 or the temperature established during the most recent emissions test that demonstrated compliance with the applicable VOC emission limitations.
 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 or the temperature established during the most recent emissions test that demonstrated compliance with the applicable VOC emission limitations.
 6. 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 VOC emissions from the booths.
 7. The number of revolutions per hour (RPH) of the rotor wheelhouse shall be continuously maintained, when the emissions unit is in operation, at a value within +/- 10% of the average hourly RPH value established during the most recent emissions test that demonstrated compliance with the applicable VOC emission limitations.

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C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for emissions units 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 volatile 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 VOC 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 volatile 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 VOC 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 VOC 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, in pounds per day, using the hourly emission rate from the latest emissions test;
 - 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, $[(f - k)/(f) \times 100\%]$.

[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 VOC emissions, in tons per month, and the rolling, 12-month summation of controlled VOC 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 VOC emissions, in tons per month, and the rolling, 12-month summation of uncontrolled VOC emissions, in tons per year, from all coatings and cleanup materials

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- employed in the uncontrolled booths of R031 and R032 combined (A5 and B5, respectively); and
- g. The total (controlled booths plus uncontrolled booths) VOC emissions, in tons per month, and the total (controlled booths plus uncontrolled booths) rolling, 12-month summation of VOC emissions, in tons per year, from all coatings and cleanup materials employed in emissions units 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 eight 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 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).
- 5. The permittee shall measure and record the pressure differential between the exterior and the interior of each controlled spray booth weekly in the coating line while the emissions unit is in operation to ensure compliance with the operational restriction in section B.6. The permittee shall

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record any adjustments to the fans which alter or change the air flow in the spray booths and capture and control system.

6. The permittee shall collect and record the following information each month for the entire facility:
 - a. The name and identification number of each coating, employed;
 - b. The individual Hazardous Air Pollutant (HAP)* content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)];
 - d. The number of gallons of each coating employed;
 - e. The name and identification of each cleaning, washoff and gluing material employed;
 - f. The individual HAP content for each HAP of each cleaning, washoff and gluing material, in pounds of individual HAP per gallon of cleaning material, washoff and gluing material as applied;
 - g. The total combined HAP content of each cleaning, washoff and gluing material, in pounds of combined HAPs per gallon of cleaning, washoff and gluing material, as applied [sum all the individual HAP contents from (f)];
 - h. The number of gallons of each cleaning, washoff and gluing material employed;
 - i. The total individual HAP emissions for each HAP from all coatings and cleaning, washoff and gluing materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleaning, washoff and gluing material];
 - j. The total combined HAP emissions from all coatings and cleaning, washoff and gluing materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleaning, washoff and gluing material];
 - k. The updated rolling, 12-month summation of emissions for each individual HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
 - l. The updated rolling, 12-month summation of emissions for total combined HAP, in pounds or tons. This shall include the information for the current month and the preceding

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eleven calender months.

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Monthly records shall be completed within 15 days following the end of each calendar month.

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* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

7. The permittee shall collect and record the following information each month for the entire facility for the purpose of demonstrating compliance with the annual VOC emission rate of 98.5 TPY VOC combined, based on a rolling 12-month summation:
 - a. The name and identification number of each coating and cleaning, washoff and gluing material employed;
 - b. The volume, in gallons, of each coating and cleaning, washoff and gluing material employed;
 - c. The VOC content of each coating and cleaning, washoff and gluing material, in pounds of VOC per gallon, as applied;
 - d. The amount of VOC emitted for all coating and cleaning washoff and gluing materials employed, in pounds per month, (b)x(c);
 - e. The rolling 12-month* usage for coating and cleaning, washoff and gluing materials, in gallons;
 - f. The rolling 12-month* VOC emission rate in tons per year (in tons, rounded off to one decimal place); and
 - g. Monthly records shall be completed within 15 days following the end of each calendar month.

*A rolling 12-month period includes the previous set of 12 calendar months.

The records shall be maintained for five years, and upon request the permittee shall submit such records to the appropriate Ohio EPA District Office or local air agency.

8. The permittee shall maintain for this facility all purchase orders and invoices of VOC-containing materials. The permittee shall retain such purchase orders and invoices for at least five years from their date of issuance. Upon request, the permittee shall make available to the Director of the Ohio EPA, or an authorized representative of the Director, such purchase orders and invoices for use in confirming the general accuracy of the records maintained and the reports submitted

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regarding material usage.

9. For each shipment of waste cleaning solvent sent to a solvent recycler, the permittee must obtain the following information:

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- a. The weight percent solids;
- b. The weight percent water;
- c. The density of waste material shipped;
- d. The total gallons of waste material shipped;
- e. The pounds of VOC per gallon;
- f. The VOC credit in pounds VOC per shipment; and
- g. Confirmation that the waste was received and will be reclaimed.

The permittee shall ensure that the pounds VOC per gallon, weight percent solids, weight percent water, and density of waste material are calculated by the solvent reclaimer using Method 24 in Appendix A, 40 CFR Part 60.

The permittee shall maintain at its plant copies of this information for five years after each shipment.

10. On a daily basis, when the emissions unit is in operation, the permittee shall determine the actual RPH for the rotor wheelhouse and maintain a record of the result.
11. The permittee shall measure the VOC concentration in the exhaust gases from the rotor wheelhouse on a daily basis (when the emissions unit is in operation) using USEPA Method 21 and shall maintain a record of the result of each measurement. The purpose of these measurements is to determine whether or not the VOC concentrations in the exhaust gases indicate "breakthrough" conditions for the operation of the rotor wheelhouse.

D. 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 B.3 of these terms and conditions;
 - b. All 3-hour blocks of time during which the average temperature of the desorption air

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stream prior to the VOC concentrator wheel does not comply with the temperature limitation specified in section B.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 B.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.

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 VOC content limits for coatings and cleanup materials in section A.2.a through A.2.c;
 - b. The daily controlled and uncontrolled VOC emissions limits for emissions units R031 and R032 combined in section A.1;
 - c. The daily coating and cleanup material usage limits for emissions units R031 and R032

combined in section B.1;

- d. The daily overall control efficiency limitations in sections A.2.e. and A.2.f; and
- e. The limitation in section B.7 concerning the the RPH for the rotor wheelhouse.

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 VOC emissions, in tons, from the uncontrolled booths of R031 and R032 combined (A5 and B5, respectively);
 - b. The rolling, 12-month VOC 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) VOC 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 submit quarterly deviation reports that identify all periods of time during

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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.

6. The permittee shall submit quarterly deviation reports which identify any exceedance of the HAP emission limitations set forth in term A.2.j.

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. If the facility has a rolling 12 month record that exceeds the 98.5 tons of VOC identified in term A.2.i, the permittee shall submit the following:

- a. Within 30 days after the end of that rolling 12-month period in which the exceedance occurred, a notification to the appropriate Ohio EPA District Office or local air agency that the VOC emission limit was exceeded; and
- b. Exceeding the 98.5 TPY VOC limit is a violation for each day of the last month of each 12 month period in which the 98.5 TPY limit is exceeded regardless of whether a compliance plan is submitted.

E. Testing Requirements

1. If required emission testing to demonstrate compliance with the limitations in terms A.2.e and A.2.f shall comply with the following requirements:
 - a. 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;
 - b. The test methods which the permittee must employ are specified in E.1.c. and E.1.d. below;
 - c. 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.
 - d. 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

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consideration of the potential presence of interfering gases;

- e. 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.

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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.

2. OAC rule 3745-21-10(B) shall be used to determine the VOC contents of the coatings, cleaning, washoff and gluing materials employed in this emissions unit. If, pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating, cleaning, washoff or gluing material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for the coating, cleaning, washoff or gluing material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

Method 24 or 24A can be performed by the permittee or other party (i.e., the permittee's coating, cleaning, washoff or gluing material supplier).

3. Compliance with the VOC emission limitations outlined in term A.2.a, A.2.b and A.2.c shall be demonstrated by the required recordkeeping in term C.1.
5. Compliance with the VOC emission limitation outlined in term A.2.i shall be demonstrated by the required recordkeeping in term C.7.
6. Compliance with the HAP limitations outlined in term A.2.j shall be demonstrated by the record keeping in term C.6.

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7. Compliance with the TPY emissions limitations outlined in term A.1 shall be demonstrated by the record keeping in term C.2.

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8. Compliance with the usage limitations outlined in term B.1 shall be demonstrated by the record keeping in term C.1.
9. Compliance with the usage limitations outlined in term B.2 shall be demonstrated by the record keeping in term C.2.

F. Miscellaneous Requirement

1. The following terms and conditions of this permit are federally enforceable: A, B, C, D, and E.
2. This federally enforceable permit limits the potential emissions of volatile organic compounds from the plastic parts coating processes and associated cleaning, washoff and gluing processes located at this facility to no more than 98.5 TPY during any rolling 12-month period. Should VOC emissions from the plastic parts coating and associated cleaning, washoff and gluing processes exceed 98.5 TPY during any rolling 12-month period, this facility should notify the Hamilton County Department of Environmental Services within 30 days.
3. Except as otherwise defined in the terms A thru E, the following terms have the following meanings:

"Employed" shall mean the use of coatings and/or cleaning solvent in a manner which contributes directly to emissions, but shall not include such use which is a part of a recycle or reuse process or procedure, except for actual emissions;

"PRM" shall mean any photochemically reactive material or substance containing a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5); and

"Volatile organic compound" shall mean any volatile organic compound as defined in OAC rule 3745-21-01(B)(6);
4. Modeling in this permit to install to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because there will be no increase in the emissions unit's maximum hourly emissions for any toxic compound.
5. The terms and conditions listed in this permit to install shall supercede all the air pollution control requirements contained in permit to install 14-2955 as issued on March 5, 2002.

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Applicable Emissions
Limitations/Control Measures

470 lbs/day VOC (including cleanup) from the controlled booths of R031 and R032 combined (A1-A4, A6 and B1-B4);

420 lbs/day VOC (including cleanup) from the uncontrolled booths of R031 and R032 combined (A5 and B5);

See terms A.2.a. through A.2.c. and B.1.

The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(1), 3745-21-07(G)(2), 3745-21-07(G)(6) and OAC rule 3745-31-05(D).

46.7 TPY of VOC (excluding cleanup), based upon a rolling, 12-month summation from the controlled booths of R031 and R032 combined (A1-A4, A6 and B1-B4);

33.8 TPY of VOC (excluding cleanup), based upon a rolling, 12-month summation from the uncontrolled booths of R031 and R032 combined (A5 and B5);

80.5 TPY of VOC (including cleanup), based upon a rolling,

12-month summation from all of the booths of R031 and R032 combined.

See term A.2.e.

See term A.2.d and A.2.f

See term A.2.g.

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2. Additional Terms and Conditions

- 2.a** The VOC 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 VOC per gallon of coating, based upon a daily volume-weighted average of the VOC content.
- 2.b** The VOC content of each coating employed in the uncontrolled booths of R031 and R032 (A5 and B5, respectively) shall not exceed 5.0 pounds of VOC per gallon of coating.
- 2.c** The VOC 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 VOC per gallon of cleanup material.
- 2.d** On any day in which a photochemically reactive material (PRM) is employed in an uncontrolled booth (A5 or B5) the volatile organic compound/organic compound (VOC) emissions shall not exceed 8 pounds per hour and 40 pounds per day (including cleaning material evaporated).
- 2.e** The VOC emissions from the oven associated with emissions unit 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 emissions unit R031 and booths B1 through B4 and the oven associated with emissions unit 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.

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- 2.g** 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.h** 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.1. through A.2.j., compliance with the Operational Restrictions in Terms B.1. through B.7. and the use of a control device with an overall control efficiency equal to or greater than 85%.
- 2.i** The total allowable volatile organic compound (VOC) emissions from all the plastic parts coating processes and associated cleaning, washoff and gluing processes located at this facility shall not exceed 98.5 TPY based on a rolling, 12-month summation. "Coating" means a protective, decorative, or functional material applied in a thin layer to a surface. Such materials include, but are not limited to, paints, topcoats, varnishes, sealers, stains, washcoats, basecoats, inks and temporary protective coatings. "Cleaning material" means organic solvent used to remove coating materials from equipment used in plastic parts manufacturing or coating operations. "Washoff material" means organic solvent used to remove coating from a substrate. "Gluing material" means any chemical substance that is applied for the purpose of bonding two surfaces together other than by mechanical means. "Volatile organic compound" means any volatile organic compound as defined in OAC rule 3745-21-01(B)(6).
- 2.j** The allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on a rolling, 12-month summation.

B. Operational Restrictions

- 1. The daily coating and cleanup material usage limitations for units R031 and R032 combined shall not exceed the following:
 - a. 80 gallons of coatings, for coatings employed in the uncontrolled booths of R031 and R032 (A5 and B5, respectively);
 - b. 587 gallons of coatings, for coatings employed in the controlled booths of R031 and R032 (A1 - A4, A.6 and B1- B4, respectively);

- c. 3 gallons of cleanup materials, for cleanup materials employed in the uncontrolled booths of R031 and R032 (A5 and B5, respectively); and
 - d. 12 gallons of cleanup materials, for cleanup materials employed in the controlled booths of R031 and R032 (A1- A4, A.6 and B1- B4, respectively).
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. 119,744 gallons per year of coatings and cleanup materials employed in the controlled booths (A1-A4, A6 and B1-B4); and
 - b. 13,520 gallons per year of coatings and 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 or the temperature established during the most recent emissions test that demonstrated compliance with the applicable VOC emission limitations.
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 or the temperature established during the most recent emissions test that demonstrated compliance with the applicable VOC emission limitations.
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 or the temperature established during the most recent emissions test that demonstrated compliance with the applicable VOC emission limitations.
6. 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 VOC emissions from the booths.
7. The number of revolutions per hour (RPH) of the rotor wheelhouse shall be continuously maintained, when the emissions unit is in operation, at a value within +/- 10% of the average hourly RPH value established during the most recent emissions test that demonstrated compliance with the applicable VOC emission limitations.

C. Monitoring and/or Recordkeeping Requirements

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1. The permittee shall collect and record the following information each day for emissions units 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 volatile 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 VOC 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 volatile 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 VOC 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 VOC 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, in pounds per day, using the hourly emission rate from the latest emissions test;
 - 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, $[(f - k)/(f) \times 100\%]$.

[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:

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- 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 VOC emissions, in tons per month, and the rolling, 12-month summation of controlled VOC 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 VOC emissions, in tons per month, and the rolling, 12-month summation of uncontrolled VOC 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) VOC emissions, in tons per month, and the total (controlled booths plus uncontrolled booths) rolling, 12-month summation of VOC emissions, in tons per year, from all coatings and cleanup materials employed in emissions units 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;

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- 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

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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 eight 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 collect and record the following information for each day for the uncontrolled booth (A5) 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).
5. The permittee shall measure and record the pressure differential between the exterior and the interior of each controlled spray booth weekly in the coating line while the emissions unit is in operation to ensure compliance with the operational restriction in section B.6. 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.
6. The permittee shall collect and record the following information each month for the entire facility:

- a. The name and identification number of each coating, employed;
- b. The individual Hazardous Air Pollutant (HAP)* content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
- c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)];
- d. The number of gallons of each coating employed;
- e. The name and identification of each cleaning, washoff and gluing material employed;
- f. The individual HAP content for each HAP of each cleaning, washoff and gluing material, in pounds of individual HAP per gallon of cleaning material, washoff and gluing material as applied;
- g. The total combined HAP content of each cleaning, washoff and gluing material, in pounds of combined HAPs per gallon of cleaning, washoff and gluing material, as applied [sum all the individual HAP contents from (f)];
- h. The number of gallons of each cleaning, washoff and gluing material employed;
- i. The total individual HAP emissions for each HAP from all coatings and cleaning, washoff and gluing materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleaning, washoff and gluing material];
- j. The total combined HAP emissions from all coatings and cleaning, washoff and gluing materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleaning, washoff and gluing material];
- k. The updated rolling, 12-month summation of emissions for each individual HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
- l. The updated rolling, 12-month summation of emissions for total combined HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

Monthly records shall be completed within 15 days following the end of each calendar month.

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* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

7. The permittee shall collect and record the following information each month for the entire facility for the purpose of demonstrating compliance with the annual VOC emission rate of 98.5 TPY VOC combined, based on a rolling 12-month summation:

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- a. The name and identification number of each coating and cleaning, washoff and gluing material employed;
- b. The volume, in gallons, of each coating and cleaning, washoff and gluing material employed;
- c. The VOC content of each coating and cleaning, washoff and gluing material, in pounds of VOC per gallon, as applied;
- d. The amount of VOC emitted for all coating and cleaning washoff and gluing materials employed, in pounds per month, (b)x(c);
- e. The rolling 12-month* usage for coating and cleaning, washoff and gluing materials, in gallons;
- f. The rolling 12-month* VOC emission rate in tons per year (in tons, rounded off to one decimal place); and
- g. Monthly records shall be completed within 15 days following the end of each calendar month.

*A rolling 12-month period includes the previous set of 12 calendar months.

The records shall be maintained for five years, and upon request the permittee shall submit such records to the appropriate Ohio EPA District Office or local air agency.

8. The permittee shall maintain for this facility all purchase orders and invoices of VOC-containing materials. The permittee shall retain such purchase orders and invoices for at least five years from their date of issuance. Upon request, the permittee shall make available to the Director of the Ohio EPA, or an authorized representative of the Director, such purchase orders and invoices for use in confirming the general accuracy of the records maintained and the reports submitted regarding material usage.
9. For each shipment of waste cleaning solvent sent to a solvent recycler, the permittee must obtain the following information:
 - a. The weight percent solids;
 - b. The weight percent water;

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- c. The density of waste material shipped;
- d. The total gallons of waste material shipped;
- e. The pounds of VOC per gallon;
- f. The VOC credit in pounds VOC per shipment;
- g. Confirmation that the waste was received and will be reclaimed;

The permittee shall ensure that the pounds VOC per gallon, weight percent solids, weight percent water, and density of waste material are calculated by the solvent reclaimer using Method 24 in Appendix A, 40 CFR Part 60.

The permittee shall maintain at its plant copies of this information for five years after each shipment.

10. On a daily basis, when the emissions unit is in operation, the permittee shall determine the actual RPH for the rotor wheelhouse and maintain a record of the result.
11. The permittee shall measure the VOC concentration in the exhaust gases from the rotor wheelhouse on a daily basis (when the emissions unit is in operation) using USEPA Method 21 and shall maintain a record of the result of each measurement. The purpose of these measurements is to determine whether or not the VOC concentrations in the exhaust gases indicate "breakthrough" conditions for the operation of the rotor wheelhouse.

D. 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 B.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 B.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

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specified in section B.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:

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- 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 VOC content limits for coatings and cleanup materials in section A.2.a through A.2.c;
 - b. The daily controlled and uncontrolled VOC emissions limits for emissions units R031 and R032 combined in section A.1;
 - c. The daily coating and cleanup material usage limits for emissions units R031 and R032 combined in section B.1;
 - d. The daily overall control efficiency limitations in sections A.2.e. and A.2.f; and
 - e. The limitation in section B.7 concerning the the RPH for the rotor wheelhouse.

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:

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- a. The rolling, 12-month VOC emissions, in tons, from the uncontrolled booths of R031 and R032 combined (A5 and B5, respectively);
- b. The rolling, 12-month VOC 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) VOC 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 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.

6. The permittee shall submit quarterly deviation reports which identify any exceedance of the HAP emission limitations set forth in term A.2.j.

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. If the facility has a rolling 12 month record that exceeds the 98.5 tons of VOC identified in term A.2.i, the permittee shall submit the following:
 - a. Within 30 days after the end of that rolling 12-month period in which the exceedance occurred, a notification to the appropriate Ohio EPA District Office or local air agency that the VOC emission limit was exceeded; and
 - b. Exceeding the 98.5 TPY VOC limit is a violation for each day of the last month of each 12 month period in which the 98.5 TPY limit is exceeded regardless of whether a compliance plan is submitted.

E. Testing Requirements

1. If required emission testing to demonstrate compliance with the limitations in terms A.2.e and A.2.f shall comply with the following requirements:
 - a. 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.;
 - b. The test methods which the permittee must employ are specified in E.1.c and E.1.d below;
 - c. 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;

- d. 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

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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; and

- e. 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).

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.

2. OAC rule 3745-21-10(B) shall be used to determine the VOC contents of the coatings, cleaning, washoff and gluing materials employed in this emissions unit. If, pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating, cleaning, washoff or gluing material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for the coating, cleaning, washoff or gluing material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

Method 24 or 24A can be performed by the permittee or other party (i.e., the permittee's coating, cleaning, washoff or gluing material supplier).

3. Compliance with the VOC emission limitations outlined in term A.2.a, A.2.b and A.2.c shall be demonstrated by the required record keeping in term C.1.
5. Compliance with the VOC emission limitation outlined in term A.2.i shall be demonstrated by the required record keeping in term C.7.
6. Compliance with the HAP limitations outlined in term A.2.j shall be demonstrated by the record keeping in term C.6.
7. Compliance with the TPY emissions limitations outlined in term A.1 shall be demonstrated by the record keeping in term C.2.
8. Compliance with the usage limitations outlined in term B.1 shall be demonstrated by the record keeping in term C.1.
9. Compliance with the usage limitations outlined in term B.2 shall be demonstrated by the record keeping in term C.2.

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F. Miscellaneous Requirement

1. The following terms and conditions of this permit are federally enforceable: A., B., C., D., and E.
2. This federally enforceable permit limits the potential emissions of volatile organic compounds from the plastic parts coating processes and associated cleaning, washoff and gluing processes located at this facility to no more than 98.5 TPY during any rolling 12-month period. Should VOC emissions from the plastic parts coating and associated cleaning, washoff and gluing processes exceed 98.5 TPY during any rolling 12-month period, this facility should notify the Hamilton County Department of Environmental Services within 30 days.
3. Except as otherwise defined in the terms A thru E, the following terms have the following meanings:

"Employed" shall mean the use of coatings and/or cleaning solvent in a manner which contributes directly to emissions, but shall not include such use which is a part of a recycle or reuse process or procedure, except for actual emissions;

"PRM" shall mean any photochemically reactive material or substance containing a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5); and

"Volatile organic compound" shall mean any volatile organic compound as defined in OAC rule 3745-21-01(B)(6).
4. Modeling in this permit to install to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because there will be no increase in the emissions unit's maximum hourly emissions for any toxic compound.
5. The terms and conditions listed in this permit to install shall supercede all the air pollution control requirements contained in permit to install 14-2955 as issued on March 5, 2002.