



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

**RE: FINAL PERMIT TO INSTALL
SUMMIT COUNTY
Application No: 16-1936**

DATE: December 15, 1999

Ferriot Inc
Gordon F Keeler Jr
2685 Mogadore Road
Akron, OH 44312-0248

CERTIFIED MAIL

X	TOXIC REVIEW
	PSD
X	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
X	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

Very truly yours,

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

cc: USEPA
AKRON REGIONAL AIR QUALITY MANAGEMENT

REC'D. ARACMDI

17 DEC 99 12: 26

FINAL PERMIT TO INSTALL 16-1936

Application Number: 16-1936

APS Premise Number: 1677011093

Permit Fee: **\$1,400**

Name of Facility: Ferriot Inc

Person to Contact: Gordon F Keeler Jr

Address: 2685 Mogadore Road
Akron, OH 44312-0248

Location of proposed air contaminant source(s) [emissions unit(s)]:

2685 Mogadore Road**Akron, Ohio**

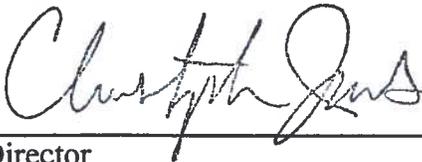
Description of proposed emissions unit(s):

SEVEN (7) SPRAY BOOTHS.

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

Part I - GENERAL TERMS AND CONDITIONS

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 Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping 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 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 are inadequate 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 prove to be inadequate 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 application must be made to the Director for the installation or modification of any other emissions unit(s).

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

Ferriot Inc

PTI Application: 16-1936

December 15, 1999

Facility ID: 1677011093

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>
Organic Compounds	99.0
Individual Hazardous Air Pollutants	9.9
Combined Air Pollutants	24.9

REC'D. ARAQMD

17 DEC 99 12:26

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>
Booth #1 - plastic parts coating booth with hot-air (0-125 degrees Fahrenheit) drying oven.	OAC rule 3745-31-05(A)(3)	5.07 pounds of OC/hour and on any day when photochemically reactive materials are used, 40 pounds of OC/day from coatings (as applied after any final thinning) and cleanup/purge materials.
	OAC rule 3745-35-07(B)	Facility-wide Organic Compound (OC) emissions (assume all OCs used are emitted) shall not exceed 99.0 tons per year as a rolling 12-month summation.
		Facility-wide individual Hazardous Air Pollutant (HAP) emissions shall not exceed 9.9 tons per year as a rolling 12-month summation.
		Facility-wide combined HAP emissions shall not exceed 24.9 tons per year as a rolling 12-month summation.
	OAC rule 3745-21-07(G)(2)	The mass emission limitations under OAC rule 3745-21-07(G)(2) are less stringent than the mass emission limitations under OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The above hourly OC emission limit regulated under OAC rule 3745-31-05(A)(3) is based upon the potential to emit for this emissions unit, as determined from permit application data. Therefore, no recordkeeping, reporting, nor emissions calculations are required to demonstrate compliance with this emission limit. However, if any proposed change(s), such

as with coating formulations, thinning or reducing ratios, maximum coating application rate capacity, cleanup/purge materials, etc., or any other change(s), increase(s) the emissions unit's potential to emit, then the permittee shall apply for and obtain either a modification to this permit to install or a new final permit to install prior to making the change(s).

- 2.b** The maximum annual OC emissions (usage is assumed to be equivalent to emissions) from the facility shall not exceed 99.0 TPY, based upon a rolling 12-month summation of the monthly emissions. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Facility-wide Cumulative Emissions of OC (Tons)</u>
1	8.25
1-2	16.5
1-3	24.8
1-4	33.0
1-5	41.2
1-6	49.5
1-7	57.8
1-8	66.0
1-9	74.2
1-10	82.5
1-11	90.8
1-12	99.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual facility-wide emission limitation for OC shall be based upon a rolling, 12-month summation of the monthly emissions.

- 2.c** The maximum annual individual HAP emissions from the facility shall not exceed 9.9 TPY, based upon a rolling 12-month summation of the monthly emissions. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Facility-wide Cumulative Emissions of Individual HAP (Tons)</u>
1	0.82
1-2	1.65
1-3	2.48
1-4	3.30
1-5	4.12
1-6	4.95

1-7	5.78
1-8	6.60
1-9	7.42
1-10	8.25
1-11	9.08
1-12	9.90

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual facility-wide emission limitation for individual HAP shall be based upon a rolling, 12-month summation of the monthly emissions.

- 2.d** The maximum annual combined HAP emissions from the facility shall not exceed 24.9 TPY, based upon a rolling 12-month summation of the monthly emissions. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Facility-wide Cumulative Emissions of Individual HAP (Tons)</u>
1	2.08
1-2	4.15
1-3	6.22
1-4	8.30
1-5	10.38
1-6	12.45
1-7	14.52
1-8	16.60
1-9	18.68
1-10	20.75
1-11	22.82
1-12	24.90

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual facility-wide emission limitation for combined HAP shall be based upon a rolling, 12-month summation of the monthly emissions.

- 2.e** The permittee shall comply with Ohio EPA's "Air Toxics Policy" (see section F below).
- 2.f** The permittee shall employ properly installed, operated, and maintained, according to the manufacturer's recommendations, instructions, and operating manuals, exhaust fan panel filters to control paint overspray.
- 2.g** The permittee shall employ a properly installed, operated, and maintained, according to the manufacturer's recommendations, instructions, and operating manuals, high volume low pressure (HVLP) paint system to increase solids transfer efficiency.

B. Operational Restrictions

None.

C. Monitoring and/or Recordkeeping Requirements

1. Formulation data or USEPA Method 24 shall be used to determine the OC and HAP contents of the coatings and cleanup/purge materials. The coating information must be for the coatings as applied, including any thinning solvents added at the emissions unit.
2. The permittee shall collect and record the following information each day photochemically reactive materials are used in the coating line:
 - a. The company identification of each coating and cleanup/purge material used.
 - b. The number of gallons of each coating and cleanup/purge material used.
 - c. The OC content of each coating and cleanup/purge material used, in pounds OC/gallon.
 - d. The total emissions from all coatings and cleanup/purge materials used, in pounds OC/day, i.e., the sum of [b x c] for all coatings and cleanup/purge materials used.

[Note: Photochemically reactive material is defined in OAC rule 3745-21-01(C)(5).]

3. The permittee shall collect and record monthly the following facility-wide information (for all emissions units at the facility) to determine the facility-wide emissions of OC, individual HAP, and combined HAP:
 - a. The company identification for each coating and cleanup/purge material employed.
 - b. The number of gallons of each coating and cleanup/purge material employed.
 - c. The OC content of each coating and cleanup/purge material, in pounds OC per gallon.
 - d. The individual HAP content for each individual HAP of each coating and cleanup/purge material, in pounds individual HAP per gallon.
 - e. The combined HAP content of each coating and cleanup/purge material, in pounds combined HAP per gallon.
 - f. The total OC emissions from all coatings and cleanup/purge materials employed, in tons, i.e., the sum of [(b x c)/2000] for all coatings and cleanup/purge materials employed.

facility-wide individual HAP emissions exceeded the maximum allowable cumulative monthly facility-wide emissions of individual HAP.

- d. Identification of each calendar month of the first 12 calendar months of operation after the issuance of this permit, during which the cumulative monthly facility-wide combined HAP emissions exceeded the maximum allowable cumulative monthly facility-wide emissions of combined HAP.
- e. Identification of each rolling 12-month summation, after the first 12 calendar months of operation following the issuance of this permit, during which the 12-month summation of facility-wide OC emissions exceeded the maximum allowable annual facility-wide emissions of OC.
- f. Identification of each rolling 12-month summation, after the first 12 calendar months of operation following the issuance of this permit, during which for each individual HAP the 12-month summation of facility-wide individual HAP emissions exceeded the maximum allowable annual facility-wide emissions of individual HAP.
- g. Identification of each rolling 12-month summation, after the first 12 calendar months of operation following the issuance of this permit, during which the 12-month summation of facility-wide combined HAP emissions exceeded the maximum allowable annual facility-wide emissions of combined HAP.

E. Testing Requirements

1. Compliance with the emission limitations in Section A of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation: 5.07 pounds of OC/hour

Applicable Compliance Method: The hourly OC emissions limitation is based upon the emission unit's potential to emit (when employing stain), as demonstrated below:

$$PTE[OC]_h = (CLC_{max}) \times (OQC_{max}) \times (OCC_{max}) + (CMU_{max}) \times (CMD)$$

Where:

- *PTE[OC]h = 5.07 pounds of OC/hour [hourly potential to emit OC];
- *CLC_{max} = 47 frames/hour [maximum coating line capacity];
- *OQC_{max} = 0.014 gallon of coating/frame [maximum quantity for optimum quality coating];
- *OCC_{max} = 6.42 pounds/gallon, as applied after final thinning [highest OC content coating];
- *CMU_{max} = 308 gallons of cleanup/purge material/2450 hours [maximum average hourly cleanup/purge material usage of which all solvent is lost through evaporation and none recovered];

*CMD = 6.71 pounds of OC/gallon of cleanup/purge material [density of cleanup/purge material].

- b. Emission Limitation: 40 pounds of OC/day

Applicable Compliance Method: Compliance shall be based upon the recordkeeping specified in Section C.

- c. Emission Limitations: Maximum allowable cumulatively monthly facility-wide OC emissions, individual HAP emissions (for each individual HAP), and combined HAP emissions for the first 12 calendar months of operation following the issuance of this permit.

Applicable Compliance Method: Compliance shall be based upon the recordkeeping specified in Section C.

- d. Emission Limitations: Maximum allowable annual facility-wide OC emissions, individual HAP emissions (for each individual HAP), and combined HAP emissions, after the first 12 calendar months of operation following the issuance of this permit.

Applicable Compliance Method: Compliance shall be based upon the recordkeeping specified in Section C.

F. Miscellaneous Requirements

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worse case" pollutant(s):

Pollutant: MEK (CAS 78-93-3)

TLV (ug/m3): 590,000

Maximum Average Hourly Facility-wide Emission Rate (lbs/hr): 35.5

Predicted 1-Hour Maximum Ground-Level Concentration at 29 m (ug/m3): 4900

MAGLC (ug/m3): 14,000

2. Physical changes or changes in the method of operation of the emissions unit that result in changes to the factors affecting the air toxic analysis could result in noncompliance with this permit to install. In order to avoid this noncompliance situation, prior to initiating any changes, permittees are

required to conduct an evaluation to determine that the "Air Toxic Policy" is still satisfied. Changes that can affect the "Air Toxic Policy" include, but are not limited to, the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
 - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

4. The following line items of these terms and conditions are federally enforceable:
A.2.b A.2.c. A.2.d. C.1. C.2. C.3. D.1. E.1.b. E.1.c. E.1.d.

REC'D. ARAQMD

17 DEC 99 12: 27

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>
Booth #1 - plastic parts coating booth with hot-air (0-125 degrees Fahrenheit) drying oven.	OAC rule 3745-31-05(A)(3)	5.07 pounds of OC/hour and on any day when photochemically reactive materials are used, 40 pounds of OC/day from coatings (as applied after any final thinning) and cleanup/purge materials.
	OAC rule 3745-35-07(B)	Facility-wide Organic Compound (OC) emissions (assume all OCs used are emitted) shall not exceed 99.0 tons per year as a rolling 12-month summation.
		Facility-wide individual Hazardous Air Pollutant (HAP) emissions shall not exceed 9.9 tons per year as a rolling 12-month summation.
		Facility-wide combined HAP emissions shall not exceed 24.9 tons per year as a rolling 12-month summation.
	OAC rule 3745-21-07(G)(2)	The mass emission limitations under OAC rule 3745-21-07(G)(2) are less stringent than the mass emission limitations under OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The above hourly OC emission limit regulated under OAC rule 3745-31-05(A)(3) is based upon the potential to emit for this emissions unit, as determined from permit application data. Therefore, no recordkeeping, reporting, nor emissions calculations are required to

demonstrate compliance with this emission limit. However, if any proposed change(s), such as with coating formulations, thinning or reducing ratios, maximum coating application rate capacity, cleanup/purge materials, etc., or any other change(s), increase(s) the emissions unit's potential to emit, then the permittee shall apply for and obtain either a modification to this permit to install or a new final permit to install prior to making the change(s).

- 2.b** The maximum annual OC emissions (usage is assumed to be equivalent to emissions) from the facility shall not exceed 99.0 TPY, based upon a rolling 12-month summation of the monthly emissions. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Facility-wide Cumulative Emissions of OC (Tons)</u>
1	8.25
1-2	16.5
1-3	24.8
1-4	33.0
1-5	41.2
1-6	49.5
1-7	57.8
1-8	66.0
1-9	74.2
1-10	82.5
1-11	90.8
1-12	99.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual facility-wide emission limitation for OC shall be based upon a rolling, 12-month summation of the monthly emissions.

- 2.c** The maximum annual individual HAP emissions from the facility shall not exceed 9.9 TPY, based upon a rolling 12-month summation of the monthly emissions. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Facility-wide Cumulative Emissions of Individual HAP (Tons)</u>
1	0.82
1-2	1.65
1-3	2.48
1-4	3.30
1-5	4.12

Ferriot IncPTI Application: **16-1936****December 15, 1999**Facility ID: **1677011093**Emissions Unit ID: **R002**

1-6	4.95
1-7	5.78
1-8	6.60
1-9	7.42
1-10	8.25
1-11	9.08
1-12	9.90

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual facility-wide emission limitation for individual HAP shall be based upon a rolling, 12-month summation of the monthly emissions.

- 2.d** The maximum annual combined HAP emissions from the facility shall not exceed 24.9 TPY, based upon a rolling 12-month summation of the monthly emissions. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Facility-wide Cumulative Emissions of Individual HAP (Tons)</u>
1	2.08
1-2	4.15
1-3	6.22
1-4	8.30
1-5	10.38
1-6	12.45
1-7	14.52
1-8	16.60
1-9	18.68
1-10	20.75
1-11	22.82
1-12	24.90

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual facility-wide emission limitation for combined HAP shall be based upon a rolling, 12-month summation of the monthly emissions.

- 2.e** The permittee shall comply with Ohio EPA's "Air Toxics Policy" (see section F below).
- 2.f** The permittee shall employ properly installed, operated, and maintained, according to the manufacturer's recommendations, instructions, and operating manuals, exhaust fan panel filters to control paint overspray.

- c. Identification of each calendar month of the first 12 calendar months of operation after the issuance of this permit, during which for each individual HAP the cumulative monthly facility-wide individual HAP emissions exceeded the maximum allowable cumulative monthly facility-wide emissions of individual HAP.
- d. Identification of each calendar month of the first 12 calendar months of operation after the issuance of this permit, during which the cumulative monthly facility-wide combined HAP emissions exceeded the maximum allowable cumulative monthly facility-wide emissions of combined HAP.
- e. Identification of each rolling 12-month summation, after the first 12 calendar months of operation following the issuance of this permit, during which the 12-month summation of facility-wide OC emissions exceeded the maximum allowable annual facility-wide emissions of OC.
- f. Identification of each rolling 12-month summation, after the first 12 calendar months of operation following the issuance of this permit, during which for each individual HAP the 12-month summation of facility-wide individual HAP emissions exceeded the maximum allowable annual facility-wide emissions of individual HAP.
- g. Identification of each rolling 12-month summation, after the first 12 calendar months of operation following the issuance of this permit, during which the 12-month summation of facility-wide combined HAP emissions exceeded the maximum allowable annual facility-wide emissions of combined HAP.

E. Testing Requirements

- 1. Compliance with the emission limitations in Section A of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation: 5.07 pounds of OC/hour

Applicable Compliance Method: The hourly OC emissions limitation is based upon the emission unit's potential to emit (when employing stain), as demonstrated below:

$$PTE[OC]h = (CLC_{max}) \times (OQC_{max}) \times (OCC_{max}) + (CMU_{max}) \times (CMD)$$

Where:

*PTE[OC]h = 5.07 pounds of OC/hour [hourly potential to emit OC];

*CLC_{max} = 47 frames/hour [maximum coating line capacity];

*OQC_{max} = 0.014 gallon of coating/frame [maximum quantity for optimum quality coating];

*OCC_{max} = 6.42 pounds/gallon, as applied after final thinning [highest OC content coating];

*CMU_{max} = 308 gallons of cleanup/purge material/2450 hours [maximum average hourly cleanup/purge material usage of which all solvent is lost through evaporation and none recovered];

*CMD = 6.71 pounds of OC/gallon of cleanup/purge material [density of cleanup/purge material].

b. Emission Limitation: 40 pounds of OC/day

Applicable Compliance Method: Compliance shall be based upon the recordkeeping specified in Section C.

c. Emission Limitations: Maximum allowable cumulative monthly facility-wide OC emissions, individual HAP emissions (for each individual HAP), and combined HAP emissions for the first 12 calendar months of operation following the issuance of this permit.

Applicable Compliance Method: Compliance shall be based upon the recordkeeping specified in Section C.

d. Emission Limitations: Maximum allowable annual facility-wide OC emissions, individual HAP emissions (for each individual HAP), and combined HAP emissions, after the first 12 calendar months of operation following the issuance of this permit.

Applicable Compliance Method: Compliance shall be based upon the recordkeeping specified in Section C.

F. Miscellaneous Requirements

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worse case" pollutant(s):

Pollutant: MEK (CAS 78-93-3)

TLV (ug/m³): 590,000

Maximum Average Hourly Facility-wide Emission Rate (lbs/hr): 35.5

Predicted 1-Hour Maximum Ground-Level Concentration at 29 m (ug/m³): 4900

MAGLC (ug/m³): 14,000

2. Physical changes or changes in the method of operation of the emissions unit that result in changes to the factors affecting the air toxic analysis could result in noncompliance with this permit to install. In order to avoid this noncompliance situation, prior to initiating any changes, permittees are required to conduct an evaluation to determine that the "Air Toxic Policy" is still satisfied. Changes that can affect the "Air Toxic Policy" include, but are not limited to, the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
 - a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
 - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

4. The following line items of these terms and conditions are federally enforceable:
A.2.b A.2.c. A.2.d. C.1. C.2. C.3. D.1. E.1.b. E.1.c. E.1.d.

REC'D. ARAQMD

17 DEC 99 12:27

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>
Booth #1 - plastic parts coating booth with hot-air (0-125 degrees Fahrenheit) drying oven.	OAC rule 3745-31-05(A)(3)	5.07 pounds of OC/hour and on any day when photochemically reactive materials are used, 40 pounds of OC/day from coatings (as applied after any final thinning) and cleanup/purge materials.
	OAC rule 3745-35-07(B)	Facility-wide Organic Compound (OC) emissions (assume all OCs used are emitted) shall not exceed 99.0 tons per year as a rolling 12-month summation.
		Facility-wide individual Hazardous Air Pollutant (HAP) emissions shall not exceed 9.9 tons per year as a rolling 12-month summation.
		Facility-wide combined HAP emissions shall not exceed 24.9 tons per year as a rolling 12-month summation.
	OAC rule 3745-21-07(G)(2)	The mass emission limitations under OAC rule 3745-21-07(G)(2) are less stringent than the mass emission limitations under OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The above hourly OC emission limit regulated under OAC rule 3745-31-05(A)(3) is based upon the potential to emit for this emissions unit, as determined from permit application data. Therefore, no recordkeeping, reporting, nor emissions calculations are required to demonstrate compliance with this emission limit. However, if any proposed change(s), such

as with coating formulations, thinning or reducing ratios, maximum coating application rate capacity, cleanup/purge materials, etc., or any other change(s), increase(s) the emissions unit's potential to emit, then the permittee shall apply for and obtain either a modification to this permit to install or a new final permit to install prior to making the change(s).

- 2.b** The maximum annual OC emissions (usage is assumed to be equivalent to emissions) from the facility shall not exceed 99.0 TPY, based upon a rolling 12-month summation of the monthly emissions. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Facility-wide Cumulative Emissions of OC (Tons)</u>
1	8.25
1-2	16.5
1-3	24.8
1-4	33.0
1-5	41.2
1-6	49.5
1-7	57.8
1-8	66.0
1-9	74.2
1-10	82.5
1-11	90.8
1-12	99.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual facility-wide emission limitation for OC shall be based upon a rolling, 12-month summation of the monthly emissions.

- 2.c** The maximum annual individual HAP emissions from the facility shall not exceed 9.9 TPY, based upon a rolling 12-month summation of the monthly emissions. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Facility-wide Cumulative Emissions of Individual HAP (Tons)</u>
1	0.82
1-2	1.65
1-3	2.48
1-4	3.30
1-5	4.12
1-6	4.95

1-7	5.78
1-8	6.60
1-9	7.42
1-10	8.25
1-11	9.08
1-12	9.90

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual facility-wide emission limitation for individual HAP shall be based upon a rolling, 12-month summation of the monthly emissions.

- 2.d** The maximum annual combined HAP emissions from the facility shall not exceed 24.9 TPY, based upon a rolling 12-month summation of the monthly emissions. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Facility-wide Cumulative Emissions of Individual HAP (Tons)</u>
1	2.08
1-2	4.15
1-3	6.22
1-4	8.30
1-5	10.38
1-6	12.45
1-7	14.52
1-8	16.60
1-9	18.68
1-10	20.75
1-11	22.82
1-12	24.90

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual facility-wide emission limitation for combined HAP shall be based upon a rolling, 12-month summation of the monthly emissions.

- 2.e** The permittee shall comply with Ohio EPA's "Air Toxics Policy" (see section F below).
- 2.f** The permittee shall employ properly installed, operated, and maintained, according to the manufacturer's recommendations, instructions, and operating manuals, exhaust fan panel filters to control paint overspray.
- 2.g** The permittee shall employ a properly installed, operated, and maintained, according to the manufacturer's recommendations, instructions, and operating manuals, high volume low pressure (HVLP) paint system to increase solids transfer efficiency.

B. Operational Restrictions

None.

C. Monitoring and/or Recordkeeping Requirements

1. Formulation data or USEPA Method 24 shall be used to determine the OC and HAP contents of the coatings and cleanup/purge materials. The coating information must be for the coatings as applied, including any thinning solvents added at the emissions unit.
2. The permittee shall collect and record the following information each day photochemically reactive materials are used in the coating line:
 - a. The company identification of each coating and cleanup/purge material used.
 - b. The number of gallons of each coating and cleanup/purge material used.
 - c. The OC content of each coating and cleanup/purge material used, in pounds OC/gallon.
 - d. The total emissions from all coatings and cleanup/purge materials used, in pounds OC/day, i.e., the sum of [b x c] for all coatings and cleanup/purge materials used.

[Note: Photochemically reactive material is defined in OAC rule 3745-21-01(C)(5).]

3. The permittee shall collect and record monthly the following facility-wide information (for all emissions units at the facility) to determine the facility-wide emissions of OC, individual HAP, and combined HAP:
 - a. The company identification for each coating and cleanup/purge material employed.
 - b. The number of gallons of each coating and cleanup/purge material employed.
 - c. The OC content of each coating and cleanup/purge material, in pounds OC per gallon.
 - d. The individual HAP content for each individual HAP of each coating and cleanup/purge material, in pounds individual HAP per gallon.
 - e. The combined HAP content of each coating and cleanup/purge material, in pounds combined HAP per gallon.
 - f. The total OC emissions from all coatings and cleanup/purge materials employed, in tons, i.e., the sum of [(b x c)/2000] for all coatings and cleanup/purge materials employed.

facility-wide individual HAP emissions exceeded the maximum allowable cumulative monthly facility-wide emissions of individual HAP.

- d. Identification of each calendar month of the first 12 calendar months of operation after the issuance of this permit, during which the cumulative monthly facility-wide combined HAP emissions exceeded the maximum allowable cumulative monthly facility-wide emissions of combined HAP.
- e. Identification of each rolling 12-month summation, after the first 12 calendar months of operation following the issuance of this permit, during which the 12-month summation of facility-wide OC emissions exceeded the maximum allowable annual facility-wide emissions of OC.
- f. Identification of each rolling 12-month summation, after the first 12 calendar months of operation following the issuance of this permit, during which for each individual HAP the 12-month summation of facility-wide individual HAP emissions exceeded the maximum allowable annual facility-wide emissions of individual HAP.
- g. Identification of each rolling 12-month summation, after the first 12 calendar months of operation following the issuance of this permit, during which the 12-month summation of facility-wide combined HAP emissions exceeded the maximum allowable annual facility-wide emissions of combined HAP.

E. Testing Requirements

- 1. Compliance with the emission limitations in Section A of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation: 5.07 pounds of OC/hour

Applicable Compliance Method: The hourly OC emissions limitation is based upon the emission unit's potential to emit (when employing stain), as demonstrated below:

$$PTE[OC]_h = (CLC_{max}) \times (OQC_{max}) \times (OCC_{max}) + (CMU_{max}) \times (CMD)$$

Where:

- *PTE[OC]h = 5.07 pounds of OC/hour [hourly potential to emit OC];
- *CLC_{max} = 47 frames/hour [maximum coating line capacity];
- *OQC_{max} = 0.014 gallon of coating/frame [maximum quantity for optimum quality coating];
- *OCC_{max} = 6.42 pounds/gallon, as applied after final thinning [highest OC content coating];
- *CMU_{max} = 308 gallons of cleanup/purge material/2450 hours [maximum average hourly cleanup/purge material usage of which all solvent is lost through evaporation and none recovered];

*CMD = 6.71 pounds of OC/gallon of cleanup/purge material [density of cleanup/purge material].

b. Emission Limitation: 40 pounds of OC/day

Applicable Compliance Method: Compliance shall be based upon the recordkeeping specified in Section C.

c. Emission Limitations: Maximum allowable cumulative monthly facility-wide OC emissions, individual HAP emissions (for each individual HAP), and combined HAP emissions for the first 12 calendar months of operation following the issuance of this permit.

Applicable Compliance Method: Compliance shall be based upon the recordkeeping specified in Section C.

d. Emission Limitations: Maximum allowable annual facility-wide OC emissions, individual HAP emissions (for each individual HAP), and combined HAP emissions, after the first 12 calendar months of operation following the issuance of this permit.

Applicable Compliance Method: Compliance shall be based upon the recordkeeping specified in Section C.

F. Miscellaneous Requirements

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worse case" pollutant(s):

Pollutant: MEK (CAS 78-93-3)

TLV (ug/m3): 590,000

Maximum Average Hourly Facility-wide Emission Rate (lbs/hr): 35.5

Predicted 1-Hour Maximum Ground-Level Concentration at 29 m (ug/m3): 4900

MAGLC (ug/m3): 14,000

2. Physical changes or changes in the method of operation of the emissions unit that result in changes to the factors affecting the air toxic analysis could result in noncompliance with this permit to install. In order to avoid this noncompliance situation, prior to initiating any changes, permittees are

required to conduct an evaluation to determine that the "Air Toxic Policy" is still satisfied. Changes that can affect the "Air Toxic Policy" include, but are not limited to, the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
 - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

4. The following line items of these terms and conditions are federally enforceable:
A.2.b A.2.c. A.2.d. C.1. C.2. C.3. D.1. E.1.b. E.1.c. E.1.d.

DEC'D. ARAOND

17 DEC 99 12:27

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>
Booth #1 - plastic parts coating booth with hot-air (0-125 degrees Fahrenheit) drying oven.	OAC rule 3745-31-05(A)(3)	5.07 pounds of OC/hour and on any day when photochemically reactive materials are used, 40 pounds of OC/day from coatings (as applied after any final thinning) and cleanup/purge materials.
	OAC rule 3745-35-07(B)	Facility-wide Organic Compound (OC) emissions (assume all OCs used are emitted) shall not exceed 99.0 tons per year as a rolling 12-month summation.
		Facility-wide individual Hazardous Air Pollutant (HAP) emissions shall not exceed 9.9 tons per year as a rolling 12-month summation.
		Facility-wide combined HAP emissions shall not exceed 24.9 tons per year as a rolling 12-month summation.
	OAC rule 3745-21-07(G)(2)	The mass emission limitations under OAC rule 3745-21-07(G)(2) are less stringent than the mass emission limitations under OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The above hourly OC emission limit regulated under OAC rule 3745-31-05(A)(3) is based upon the potential to emit for this emissions unit, as determined from permit application data. Therefore, no recordkeeping, reporting, nor emissions calculations are required to demonstrate compliance with this emission limit. However, if any proposed change(s), such

as with coating formulations, thinning or reducing ratios, maximum coating application rate capacity, cleanup/purge materials, etc., or any other change(s), increase(s) the emissions unit's potential to emit, then the permittee shall apply for and obtain either a modification to this permit to install or a new final permit to install prior to making the change(s).

- 2.b** The maximum annual OC emissions (usage is assumed to be equivalent to emissions) from the facility shall not exceed 99.0 TPY, based upon a rolling 12-month summation of the monthly emissions. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Facility-wide Cumulative Emissions of OC (Tons)</u>
1	8.25
1-2	16.5
1-3	24.8
1-4	33.0
1-5	41.2
1-6	49.5
1-7	57.8
1-8	66.0
1-9	74.2
1-10	82.5
1-11	90.8
1-12	99.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual facility-wide emission limitation for OC shall be based upon a rolling, 12-month summation of the monthly emissions.

- 2.c** The maximum annual individual HAP emissions from the facility shall not exceed 9.9 TPY, based upon a rolling 12-month summation of the monthly emissions. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Facility-wide Cumulative Emissions of Individual HAP (Tons)</u>
1	0.82
1-2	1.65
1-3	2.48
1-4	3.30
1-5	4.12
1-6	4.95

1-7	5.78
1-8	6.60
1-9	7.42
1-10	8.25
1-11	9.08
1-12	9.90

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual facility-wide emission limitation for individual HAP shall be based upon a rolling, 12-month summation of the monthly emissions.

- 2.d** The maximum annual combined HAP emissions from the facility shall not exceed 24.9 TPY, based upon a rolling 12-month summation of the monthly emissions. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Facility-wide Cumulative Emissions of Individual HAP (Tons)</u>
1	2.08
1-2	4.15
1-3	6.22
1-4	8.30
1-5	10.38
1-6	12.45
1-7	14.52
1-8	16.60
1-9	18.68
1-10	20.75
1-11	22.82
1-12	24.90

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual facility-wide emission limitation for combined HAP shall be based upon a rolling, 12-month summation of the monthly emissions.

- 2.e** The permittee shall comply with Ohio EPA's "Air Toxics Policy" (see section F below).
- 2.f** The permittee shall employ properly installed, operated, and maintained, according to the manufacturer's recommendations, instructions, and operating manuals, exhaust fan panel filters to control paint overspray.
- 2.g** The permittee shall employ a properly installed, operated, and maintained, according to the manufacturer's recommendations, instructions, and operating manuals, high volume low pressure (HVLP) paint system to increase solids transfer efficiency.

B. Operational Restrictions

None.

C. Monitoring and/or Recordkeeping Requirements

1. Formulation data or USEPA Method 24 shall be used to determine the OC and HAP contents of the coatings and cleanup/purge materials. The coating information must be for the coatings as applied, including any thinning solvents added at the emissions unit.
2. The permittee shall collect and record the following information each day photochemically reactive materials are used in the coating line:
 - a. The company identification of each coating and cleanup/purge material used.
 - b. The number of gallons of each coating and cleanup/purge material used.
 - c. The OC content of each coating and cleanup/purge material used, in pounds OC/gallon.
 - d. The total emissions from all coatings and cleanup/purge materials used, in pounds OC/day, i.e., the sum of [b x c] for all coatings and cleanup/purge materials used.

[Note: Photochemically reactive material is defined in OAC rule 3745-21-01(C)(5).]

3. The permittee shall collect and record monthly the following facility-wide information (for all emissions units at the facility) to determine the facility-wide emissions of OC, individual HAP, and combined HAP:
 - a. The company identification for each coating and cleanup/purge material employed.
 - b. The number of gallons of each coating and cleanup/purge material employed.
 - c. The OC content of each coating and cleanup/purge material, in pounds OC per gallon.
 - d. The individual HAP content for each individual HAP of each coating and cleanup/purge material, in pounds individual HAP per gallon.
 - e. The combined HAP content of each coating and cleanup/purge material, in pounds combined HAP per gallon.
 - f. The total OC emissions from all coatings and cleanup/purge materials employed, in tons, i.e., the sum of [(b x c)/2000] for all coatings and cleanup/purge materials employed.

facility-wide individual HAP emissions exceeded the maximum allowable cumulative monthly facility-wide emissions of individual HAP.

- d. Identification of each calendar month of the first 12 calendar months of operation after the issuance of this permit, during which the cumulative monthly facility-wide combined HAP emissions exceeded the maximum allowable cumulative monthly facility-wide emissions of combined HAP.
- e. Identification of each rolling 12-month summation, after the first 12 calendar months of operation following the issuance of this permit, during which the 12-month summation of facility-wide OC emissions exceeded the maximum allowable annual facility-wide emissions of OC.
- f. Identification of each rolling 12-month summation, after the first 12 calendar months of operation following the issuance of this permit, during which for each individual HAP the 12-month summation of facility-wide individual HAP emissions exceeded the maximum allowable annual facility-wide emissions of individual HAP.
- g. Identification of each rolling 12-month summation, after the first 12 calendar months of operation following the issuance of this permit, during which the 12-month summation of facility-wide combined HAP emissions exceeded the maximum allowable annual facility-wide emissions of combined HAP.

E. Testing Requirements

- 1. Compliance with the emission limitations in Section A of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation: 5.07 pounds of OC/hour

Applicable Compliance Method: The hourly OC emissions limitation is based upon the emission unit's potential to emit (when employing stain), as demonstrated below:

$$PTE[OC]_h = (CLC_{max}) \times (OQC_{max}) \times (OCC_{max}) + (CMU_{max}) \times (CMD)$$

Where:

- *PTE[OC]h = 5.07 pounds of OC/hour [hourly potential to emit OC];
- *CLC_{max} = 47 frames/hour [maximum coating line capacity];
- *OQC_{max} = 0.014 gallon of coating/frame [maximum quantity for optimum quality coating];
- *OCC_{max} = 6.42 pounds/gallon, as applied after final thinning [highest OC content coating];
- *CMU_{max} = 308 gallons of cleanup/purge material/2450 hours [maximum average hourly cleanup/purge material usage of which all solvent is lost through evaporation and none recovered];

*CMD = 6.71 pounds of OC/gallon of cleanup/purge material [density of cleanup/purge material].

b. Emission Limitation: 40 pounds of OC/day

Applicable Compliance Method: Compliance shall be based upon the recordkeeping specified in Section C.

c. Emission Limitations: Maximum allowable cumulative monthly facility-wide OC emissions, individual HAP emissions (for each individual HAP), and combined HAP emissions for the first 12 calendar months of operation following the issuance of this permit.

Applicable Compliance Method: Compliance shall be based upon the recordkeeping specified in Section C.

d. Emission Limitations: Maximum allowable annual facility-wide OC emissions, individual HAP emissions (for each individual HAP), and combined HAP emissions, after the first 12 calendar months of operation following the issuance of this permit.

Applicable Compliance Method: Compliance shall be based upon the recordkeeping specified in Section C.

F. Miscellaneous Requirements

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worse case" pollutant(s):

Pollutant: MEK (CAS 78-93-3)

TLV (ug/m3): 590,000

Maximum Average Hourly Facility-wide Emission Rate (lbs/hr): 35.5

Predicted 1-Hour Maximum Ground-Level Concentration at 29 m (ug/m3): 4900

MAGLC (ug/m3): 14,000

2. Physical changes or changes in the method of operation of the emissions unit that result in changes to the factors affecting the air toxic analysis could result in noncompliance with this permit to install. In order to avoid this noncompliance situation, prior to initiating any changes, permittees are

required to conduct an evaluation to determine that the "Air Toxic Policy" is still satisfied. Changes that can affect the "Air Toxic Policy" include, but are not limited to, the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
 - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

4. The following line items of these terms and conditions are federally enforceable:
A.2.b A.2.c. A.2.d. C.1. C.2. C.3. D.1. E.1.b. E.1.c. E.1.d.

as with coating formulations, thinning or reducing ratios, maximum coating application rate capacity, cleanup/purge materials, etc., or any other change(s), increase(s) the emissions unit's potential to emit, then the permittee shall apply for and obtain either a modification to this permit to install or a new final permit to install prior to making the change(s).

- 2.b** The maximum annual OC emissions (usage is assumed to be equivalent to emissions) from the facility shall not exceed 99.0 TPY, based upon a rolling 12-month summation of the monthly emissions. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Facility-wide Cumulative Emissions of OC (Tons)</u>
1	8.25
1-2	16.5
1-3	24.8
1-4	33.0
1-5	41.2
1-6	49.5
1-7	57.8
1-8	66.0
1-9	74.2
1-10	82.5
1-11	90.8
1-12	99.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual facility-wide emission limitation for OC shall be based upon a rolling, 12-month summation of the monthly emissions.

- 2.c** The maximum annual individual HAP emissions from the facility shall not exceed 9.9 TPY, based upon a rolling 12-month summation of the monthly emissions. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Facility-wide Cumulative Emissions of Individual HAP (Tons)</u>
1	0.82
1-2	1.65
1-3	2.48
1-4	3.30
1-5	4.12
1-6	4.95

B. Operational Restrictions

None.

C. Monitoring and/or Recordkeeping Requirements

1. Formulation data or USEPA Method 24 shall be used to determine the OC and HAP contents of the coatings and cleanup/purge materials. The coating information must be for the coatings as applied, including any thinning solvents added at the emissions unit.
2. The permittee shall collect and record the following information each day photochemically reactive materials are used in the coating line:
 - a. The company identification of each coating and cleanup/purge material used.
 - b. The number of gallons of each coating and cleanup/purge material used.
 - c. The OC content of each coating and cleanup/purge material used, in pounds OC/gallon.
 - d. The total emissions from all coatings and cleanup/purge materials used, in pounds OC/day, i.e., the sum of [b x c] for all coatings and cleanup/purge materials used.

[Note: Photochemically reactive material is defined in OAC rule 3745-21-01(C)(5).]

3. The permittee shall collect and record monthly the following facility-wide information (for all emissions units at the facility) to determine the facility-wide emissions of OC, individual HAP, and combined HAP:
 - a. The company identification for each coating and cleanup/purge material employed.
 - b. The number of gallons of each coating and cleanup/purge material employed.
 - c. The OC content of each coating and cleanup/purge material, in pounds OC per gallon.
 - d. The individual HAP content for each individual HAP of each coating and cleanup/purge material, in pounds individual HAP per gallon.
 - e. The combined HAP content of each coating and cleanup/purge material, in pounds combined HAP per gallon.
 - f. The total OC emissions from all coatings and cleanup/purge materials employed, in tons, i.e., the sum of [(b x c)/2000] for all coatings and cleanup/purge materials employed.

facility-wide individual HAP emissions exceeded the maximum allowable cumulative monthly facility-wide emissions of individual HAP.

- d. Identification of each calendar month of the first 12 calendar months of operation after the issuance of this permit, during which the cumulative monthly facility-wide combined HAP emissions exceeded the maximum allowable cumulative monthly facility-wide emissions of combined HAP.
- e. Identification of each rolling 12-month summation, after the first 12 calendar months of operation following the issuance of this permit, during which the 12-month summation of facility-wide OC emissions exceeded the maximum allowable annual facility-wide emissions of OC.
- f. Identification of each rolling 12-month summation, after the first 12 calendar months of operation following the issuance of this permit, during which for each individual HAP the 12-month summation of facility-wide individual HAP emissions exceeded the maximum allowable annual facility-wide emissions of individual HAP.
- g. Identification of each rolling 12-month summation, after the first 12 calendar months of operation following the issuance of this permit, during which the 12-month summation of facility-wide combined HAP emissions exceeded the maximum allowable annual facility-wide emissions of combined HAP.

E. Testing Requirements

- 1. Compliance with the emission limitations in Section A of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation: 5.07 pounds of OC/hour

Applicable Compliance Method: The hourly OC emissions limitation is based upon the emission unit's potential to emit (when employing stain), as demonstrated below:

$$PTE[OC]_h = (CLC_{max}) \times (OQC_{max}) \times (OCC_{max}) + (CMU_{max}) \times (CMD)$$

Where:

- *PTE[OC]h = 5.07 pounds of OC/hour [hourly potential to emit OC];
- *CLC_{max} = 47 frames/hour [maximum coating line capacity];
- *OQC_{max} = 0.014 gallon of coating/frame [maximum quantity for optimum quality coating];
- *OCC_{max} = 6.42 pounds/gallon, as applied after final thinning [highest OC content coating];
- *CMU_{max} = 308 gallons of cleanup/purge material/2450 hours [maximum average hourly cleanup/purge material usage of which all solvent is lost through evaporation and none recovered];

*CMD = 6.71 pounds of OC/gallon of cleanup/purge material [density of cleanup/purge material].

b. Emission Limitation: 40 pounds of OC/day

Applicable Compliance Method: Compliance shall be based upon the recordkeeping specified in Section C.

c. Emission Limitations: Maximum allowable cumulatively monthly facility-wide OC emissions, individual HAP emissions (for each individual HAP), and combined HAP emissions for the first 12 calendar months of operation following the issuance of this permit.

Applicable Compliance Method: Compliance shall be based upon the recordkeeping specified in Section C.

d. Emission Limitations: Maximum allowable annual facility-wide OC emissions, individual HAP emissions (for each individual HAP), and combined HAP emissions, after the first 12 calendar months of operation following the issuance of this permit.

Applicable Compliance Method: Compliance shall be based upon the recordkeeping specified in Section C.

F. Miscellaneous Requirements

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worse case" pollutant(s):

Pollutant: MEK (CAS 78-93-3)

TLV (ug/m³): 590,000

Maximum Average Hourly Facility-wide Emission Rate (lbs/hr): 35.5

Predicted 1-Hour Maximum Ground-Level Concentration at 29 m (ug/m³): 4900

MAGLC (ug/m³): 14,000

2. Physical changes or changes in the method of operation of the emissions unit that result in changes to the factors affecting the air toxic analysis could result in noncompliance with this permit to install. In order to avoid this noncompliance situation, prior to initiating any changes, permittees are

required to conduct an evaluation to determine that the "Air Toxic Policy" is still satisfied. Changes that can affect the "Air Toxic Policy" include, but are not limited to, the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
 - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

4. The following line items of these terms and conditions are federally enforceable:
A.2.b A.2.c. A.2.d. C.1. C.2. C.3. D.1. E.1.b. E.1.c. E.1.d.

REC'D. ARAQMB

17 DEC 99 10:27

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>
Booth #1 - plastic parts coating booth with hot-air (0-125 degrees Fahrenheit) drying oven.	OAC rule 3745-31-05(A)(3)	5.07 pounds of OC/hour and on any day when photochemically reactive materials are used, 40 pounds of OC/day from coatings (as applied after any final thinning) and cleanup/purge materials.
	OAC rule 3745-35-07(B)	Facility-wide Organic Compound (OC) emissions (assume all OCs used are emitted) shall not exceed 99.0 tons per year as a rolling 12-month summation.
		Facility-wide individual Hazardous Air Pollutant (HAP) emissions shall not exceed 9.9 tons per year as a rolling 12-month summation.
		Facility-wide combined HAP emissions shall not exceed 24.9 tons per year as a rolling 12-month summation.
	OAC rule 3745-21-07(G)(2)	The mass emission limitations under OAC rule 3745-21-07(G)(2) are less stringent than the mass emission limitations under OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The above hourly OC emission limit regulated under OAC rule 3745-31-05(A)(3) is based upon the potential to emit for this emissions unit, as determined from permit application data. Therefore, no recordkeeping, reporting, nor emissions calculations are required to demonstrate compliance with this emission limit. However, if any proposed change(s), such

1-7	5.78
1-8	6.60
1-9	7.42
1-10	8.25
1-11	9.08
1-12	9.90

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual facility-wide emission limitation for individual HAP shall be based upon a rolling, 12-month summation of the monthly emissions.

- 2.d** The maximum annual combined HAP emissions from the facility shall not exceed 24.9 TPY, based upon a rolling 12-month summation of the monthly emissions. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Facility-wide Cumulative Emissions of Individual HAP (Tons)</u>
1	2.08
1-2	4.15
1-3	6.22
1-4	8.30
1-5	10.38
1-6	12.45
1-7	14.52
1-8	16.60
1-9	18.68
1-10	20.75
1-11	22.82
1-12	24.90

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual facility-wide emission limitation for combined HAP shall be based upon a rolling, 12-month summation of the monthly emissions.

- 2.e** The permittee shall comply with Ohio EPA's "Air Toxics Policy" (see section F below).
- 2.f** The permittee shall employ properly installed, operated, and maintained, according to the manufacturer's recommendations, instructions, and operating manuals, exhaust fan panel filters to control paint overspray.
- 2.g** The permittee shall employ a properly installed, operated, and maintained, according to the manufacturer's recommendations, instructions, and operating manuals, high volume low pressure (HVLP) paint system to increase solids transfer efficiency.

facility-wide individual HAP emissions exceeded the maximum allowable cumulative monthly facility-wide emissions of individual HAP.

- d. Identification of each calendar month of the first 12 calendar months of operation after the issuance of this permit, during which the cumulative monthly facility-wide combined HAP emissions exceeded the maximum allowable cumulative monthly facility-wide emissions of combined HAP.
- e. Identification of each rolling 12-month summation, after the first 12 calendar months of operation following the issuance of this permit, during which the 12-month summation of facility-wide OC emissions exceeded the maximum allowable annual facility-wide emissions of OC.
- f. Identification of each rolling 12-month summation, after the first 12 calendar months of operation following the issuance of this permit, during which for each individual HAP the 12-month summation of facility-wide individual HAP emissions exceeded the maximum allowable annual facility-wide emissions of individual HAP.
- g. Identification of each rolling 12-month summation, after the first 12 calendar months of operation following the issuance of this permit, during which the 12-month summation of facility-wide combined HAP emissions exceeded the maximum allowable annual facility-wide emissions of combined HAP.

E. Testing Requirements

- 1. Compliance with the emission limitations in Section A of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation: 5.07 pounds of OC/hour

Applicable Compliance Method: The hourly OC emissions limitation is based upon the emission unit's potential to emit (when employing stain), as demonstrated below:

$$PTE[OC]h = (CLC_{max}) \times (OQC_{max}) \times (OCC_{max}) + (CMU_{max}) \times (CMD)$$

Where:

- *PTE[OC]h = 5.07 pounds of OC/hour [hourly potential to emit OC];
- *CLC_{max} = 47 frames/hour [maximum coating line capacity];
- *OQC_{max} = 0.014 gallon of coating/frame [maximum quantity for optimum quality coating];
- *OCC_{max} = 6.42 pounds/gallon, as applied after final thinning [highest OC content coating];
- *CMU_{max} = 308 gallons of cleanup/purge material/2450 hours [maximum average hourly cleanup/purge material usage of which all solvent is lost through evaporation and none recovered];

*CMD = 6.71 pounds of OC/gallon of cleanup/purge material [density of cleanup/purge material].

b. Emission Limitation: 40 pounds of OC/day

Applicable Compliance Method: Compliance shall be based upon the recordkeeping specified in Section C.

c. Emission Limitations: Maximum allowable cumulative monthly facility-wide OC emissions, individual HAP emissions (for each individual HAP), and combined HAP emissions for the first 12 calendar months of operation following the issuance of this permit.

Applicable Compliance Method: Compliance shall be based upon the recordkeeping specified in Section C.

d. Emission Limitations: Maximum allowable annual facility-wide OC emissions, individual HAP emissions (for each individual HAP), and combined HAP emissions, after the first 12 calendar months of operation following the issuance of this permit.

Applicable Compliance Method: Compliance shall be based upon the recordkeeping specified in Section C.

F. Miscellaneous Requirements

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worse case" pollutant(s):

Pollutant: MEK (CAS 78-93-3)

TLV (ug/m³): 590,000

Maximum Average Hourly Facility-wide Emission Rate (lbs/hr): 35.5

Predicted 1-Hour Maximum Ground-Level Concentration at 29 m (ug/m³): 4900

MAGLC (ug/m³): 14,000

2. Physical changes or changes in the method of operation of the emissions unit that result in changes to the factors affecting the air toxic analysis could result in noncompliance with this permit to install. In order to avoid this noncompliance situation, prior to initiating any changes, permittees are

required to conduct an evaluation to determine that the "Air Toxic Policy" is still satisfied. Changes that can affect the "Air Toxic Policy" include, but are not limited to, the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
 - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

4. The following line items of these terms and conditions are federally enforceable:
A.2.b A.2.c. A.2.d. C.1. C.2. C.3. D.1. E.1.b. E.1.c. E.1.d.

REC'D. ANAGED

17 DEC 99 12: 27

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>
Booth #1 - plastic parts coating booth with hot-air (0-125 degrees Fahrenheit) drying oven.	OAC rule 3745-31-05(A)(3)	5.07 pounds of OC/hour and on any day when photochemically reactive materials are used, 40 pounds of OC/day from coatings (as applied after any final thinning) and cleanup/purge materials.
	OAC rule 3745-35-07(B)	Facility-wide Organic Compound (OC) emissions (assume all OCs used are emitted) shall not exceed 99.0 tons per year as a rolling 12-month summation.
		Facility-wide individual Hazardous Air Pollutant (HAP) emissions shall not exceed 9.9 tons per year as a rolling 12-month summation.
		Facility-wide combined HAP emissions shall not exceed 24.9 tons per year as a rolling 12-month summation.
	OAC rule 3745-21-07(G)(2)	The mass emission limitations under OAC rule 3745-21-07(G)(2) are less stringent than the mass emission limitations under OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The above hourly OC emission limit regulated under OAC rule 3745-31-05(A)(3) is based upon the potential to emit for this emissions unit, as determined from permit application data. Therefore, no recordkeeping, reporting, nor emissions calculations are required to demonstrate compliance with this emission limit. However, if any proposed change(s), such

as with coating formulations, thinning or reducing ratios, maximum coating application rate capacity, cleanup/purge materials, etc., or any other change(s), increase(s) the emissions unit's potential to emit, then the permittee shall apply for and obtain either a modification to this permit to install or a new final permit to install prior to making the change(s).

- 2.b** The maximum annual OC emissions (usage is assumed to be equivalent to emissions) from the facility shall not exceed 99.0 TPY, based upon a rolling 12-month summation of the monthly emissions. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Facility-wide Cumulative Emissions of OC (Tons)</u>
1	8.25
1-2	16.5
1-3	24.8
1-4	33.0
1-5	41.2
1-6	49.5
1-7	57.8
1-8	66.0
1-9	74.2
1-10	82.5
1-11	90.8
1-12	99.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual facility-wide emission limitation for OC shall be based upon a rolling, 12-month summation of the monthly emissions.

- 2.c** The maximum annual individual HAP emissions from the facility shall not exceed 9.9 TPY, based upon a rolling 12-month summation of the monthly emissions. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Facility-wide Cumulative Emissions of Individual HAP (Tons)</u>
1	0.82
1-2	1.65
1-3	2.48
1-4	3.30
1-5	4.12
1-6	4.95

1-7	5.78
1-8	6.60
1-9	7.42
1-10	8.25
1-11	9.08
1-12	9.90

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual facility-wide emission limitation for individual HAP shall be based upon a rolling, 12-month summation of the monthly emissions.

- 2.d** The maximum annual combined HAP emissions from the facility shall not exceed 24.9 TPY, based upon a rolling 12-month summation of the monthly emissions. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Facility-wide Cumulative Emissions of Individual HAP (Tons)</u>
1	2.08
1-2	4.15
1-3	6.22
1-4	8.30
1-5	10.38
1-6	12.45
1-7	14.52
1-8	16.60
1-9	18.68
1-10	20.75
1-11	22.82
1-12	24.90

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual facility-wide emission limitation for combined HAP shall be based upon a rolling, 12-month summation of the monthly emissions.

- 2.e** The permittee shall comply with Ohio EPA's "Air Toxics Policy" (see section F below).
- 2.f** The permittee shall employ properly installed, operated, and maintained, according to the manufacturer's recommendations, instructions, and operating manuals, exhaust fan panel filters to control paint overspray.
- 2.g** The permittee shall employ a properly installed, operated, and maintained, according to the manufacturer's recommendations, instructions, and operating manuals, high volume low pressure (HVL) paint system to increase solids transfer efficiency.

B. Operational Restrictions

None.

C. Monitoring and/or Recordkeeping Requirements

1. Formulation data or USEPA Method 24 shall be used to determine the OC and HAP contents of the coatings and cleanup/purge materials. The coating information must be for the coatings as applied, including any thinning solvents added at the emissions unit.
2. The permittee shall collect and record the following information each day photochemically reactive materials are used in the coating line:
 - a. The company identification of each coating and cleanup/purge material used.
 - b. The number of gallons of each coating and cleanup/purge material used.
 - c. The OC content of each coating and cleanup/purge material used, in pounds OC/gallon.
 - d. The total emissions from all coatings and cleanup/purge materials used, in pounds OC/day, i.e., the sum of [b x c] for all coatings and cleanup/purge materials used.

[Note: Photochemically reactive material is defined in OAC rule 3745-21-01(C)(5).]

3. The permittee shall collect and record monthly the following facility-wide information (for all emissions units at the facility) to determine the facility-wide emissions of OC, individual HAP, and combined HAP:
 - a. The company identification for each coating and cleanup/purge material employed.
 - b. The number of gallons of each coating and cleanup/purge material employed.
 - c. The OC content of each coating and cleanup/purge material, in pounds OC per gallon.
 - d. The individual HAP content for each individual HAP of each coating and cleanup/purge material, in pounds individual HAP per gallon.
 - e. The combined HAP content of each coating and cleanup/purge material, in pounds combined HAP per gallon.
 - f. The total OC emissions from all coatings and cleanup/purge materials employed, in tons, i.e., the sum of [(b x c)/2000] for all coatings and cleanup/purge materials employed.

facility-wide individual HAP emissions exceeded the maximum allowable cumulative monthly facility-wide emissions of individual HAP.

- d. Identification of each calendar month of the first 12 calendar months of operation after the issuance of this permit, during which the cumulative monthly facility-wide combined HAP emissions exceeded the maximum allowable cumulative monthly facility-wide emissions of combined HAP.
- e. Identification of each rolling 12-month summation, after the first 12 calendar months of operation following the issuance of this permit, during which the 12-month summation of facility-wide OC emissions exceeded the maximum allowable annual facility-wide emissions of OC.
- f. Identification of each rolling 12-month summation, after the first 12 calendar months of operation following the issuance of this permit, during which for each individual HAP the 12-month summation of facility-wide individual HAP emissions exceeded the maximum allowable annual facility-wide emissions of individual HAP.
- g. Identification of each rolling 12-month summation, after the first 12 calendar months of operation following the issuance of this permit, during which the 12-month summation of facility-wide combined HAP emissions exceeded the maximum allowable annual facility-wide emissions of combined HAP.

E. Testing Requirements

1. Compliance with the emission limitations in Section A of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation: 5.07 pounds of OC/hour

Applicable Compliance Method: The hourly OC emissions limitation is based upon the emission unit's potential to emit (when employing stain), as demonstrated below:

$$PTE[OC]_h = (CLC_{max}) \times (OQC_{max}) \times (OCC_{max}) + (CMU_{max}) \times (CMD)$$

Where:

- *PTE[OC]h = 5.07 pounds of OC/hour [hourly potential to emit OC];
- *CLCmax = 47 frames/hour [maximum coating line capacity];
- *OQCmax = 0.014 gallon of coating/frame [maximum quantity for optimum quality coating];
- *OCCmax = 6.42 pounds/gallon, as applied after final thinning [highest OC content coating];
- *CMUmax = 308 gallons of cleanup/purge material/2450 hours [maximum average hourly cleanup/purge material usage of which all solvent is lost through evaporation and none recovered];

*CMD = 6.71 pounds of OC/gallon of cleanup/purge material [density of cleanup/purge material].

- b. Emission Limitation: 40 pounds of OC/day

Applicable Compliance Method: Compliance shall be based upon the recordkeeping specified in Section C.

- c. Emission Limitations: Maximum allowable cumulative monthly facility-wide OC emissions, individual HAP emissions (for each individual HAP), and combined HAP emissions for the first 12 calendar months of operation following the issuance of this permit.

Applicable Compliance Method: Compliance shall be based upon the recordkeeping specified in Section C.

- d. Emission Limitations: Maximum allowable annual facility-wide OC emissions, individual HAP emissions (for each individual HAP), and combined HAP emissions, after the first 12 calendar months of operation following the issuance of this permit.

Applicable Compliance Method: Compliance shall be based upon the recordkeeping specified in Section C.

F. Miscellaneous Requirements

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worse case" pollutant(s):

Pollutant: MEK (CAS 78-93-3)

TLV (ug/m3): 590,000

Maximum Average Hourly Facility-wide Emission Rate (lbs/hr): 35.5

Predicted 1-Hour Maximum Ground-Level Concentration at 29 m (ug/m3): 4900

MAGLC (ug/m3): 14,000

2. Physical changes or changes in the method of operation of the emissions unit that result in changes to the factors affecting the air toxic analysis could result in noncompliance with this permit to install. In order to avoid this noncompliance situation, prior to initiating any changes, permittees are

required to conduct an evaluation to determine that the "Air Toxic Policy" is still satisfied. Changes that can affect the "Air Toxic Policy" include, but are not limited to, the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
 - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

4. The following line items of these terms and conditions are federally enforceable:
A.2.b A.2.c. A.2.d. C.1. C.2. C.3. D.1. E.1.b. E.1.c. E.1.d.

REC'D. ABAQMD

7 DEC 99 12:27