



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL MODIFICATION
MEDINA COUNTY**

CERTIFIED MAIL

Street Address:

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

Mailing Address:

Lazarus Gov.
Center

Application No: 16-01972

DATE: 1/18/2001

ACCEL Group Inc
James Terranova
325 Quadral Dr
Wadsworth, OH 442819571

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$ 800** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

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

CC: USEPA

ARAQMD



Permit To Install

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

DRAFT MODIFICATION OF PERMIT TO INSTALL 16-01972

Application Number: 16-01972
APS Premise Number: 1652100086
Permit Fee: **To be entered upon final issuance**
Name of Facility: ACCEL Group Inc
Person to Contact: James Terranova
Address: 325 Quadral Dr
Wadsworth, OH 442819571

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

325 Quadral Dr
Wadsworth, Ohio

Description of proposed emissions unit(s):

Chapter 31 Modifications to panel laminating line, adhesive booth # 1, adhesive booth # 2, and hand wipe line.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

ACCEL Group Inc

Facility ID: 1652100086

PTI Application: 16-01972

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

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

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.11 below if no deviations occurred during the quarter.

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

2. Scheduled Maintenance/Malfunction Reporting

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

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

3. Risk Management Plans

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

4. Title IV Provisions

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

5. Severability Clause

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

6. General Requirements

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

7. Fees

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

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit

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shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

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

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

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

11. Best Available Technology

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

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Facility ID: 1652100086

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

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

3. Permit Transfers

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

4. 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.

5. 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.

6. 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.

7. 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.

8. 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).

9. Construction Compliance Certification

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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.

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

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

C. Permit To Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	90.88
HAP	23.73
INDIVIDUAL HAP 9.76	9.76

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>
Panel laminating line with reciprocating spray guns and electric drying oven (modification)	OAC rule 3745-31-05(A)(3)	See A.2.a through A.2.c, and C.5 below.
	OAC rule 3745-31-05(D) Synthetic Minor to avoid Title V and to avoid Prevention of Significant Deterioration (PSD)	See A.2.d, and B.2 through B.7 below.
	OAC rule 3745-21-07(G)(2)	Exempt from the requirements of this rule pursuant to term B.1 below.

2. Additional Terms and Conditions

- 2.a Volatile organic compound emissions for emissions unit R001 shall not exceed 42.3 pounds per hour, nor 63.45 tons per year.
- 2.b Acetone emissions for emissions unit R001 shall not exceed 42.3 pounds per hour, nor 61.83 tons per year.
- 2.c The volatile organic compound content of each adhesive, thinner, and cleanup material employed in this emissions unit shall not exceed 2.82 pounds per gallon, as applied.
- 2.d The combined annual emissions from the entire facility (emissions units R001, R002, R003, and R004) shall not exceed the following as rolling, 12-month summations:

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90.88 tons of volatile organic compounds (VOC);
23.73 tons of all hazardous air pollutants (HAP); and
9.76 tons of any individual HAP.

B. Operational Restrictions

1. The permittee shall not employ any photochemically reactive materials, as defined in OAC 3745-21-01(C)(5), in this emissions unit.
2. The maximum annual adhesive usage for emissions unit R001 shall not exceed 45,000 gallons, based upon a rolling, 12-month summation of the adhesive usage.
3. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the maximum allowable adhesive usage specified in the following table:

month(s)	Maximum Allowable Adhesive Usage for R001 only (gallons)
1	3,750
1-2	7,500
1-3	11,250
1-4	15,000
1-5	18,750
1-6	22,500
1-7	26,250
1-8	30,000
1-9	33,750
1-10	37,500
1-11	41,250
1-12	45,000

4. After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual adhesive usage limitation for emissions unit R001 shall be based upon a rolling, 12-month summation of the adhesive usage for emissions unit R001, in gallons.

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5. The total allowable usage [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from this facility shall be less than 10* TPY for any single HAP and 25* TPY for any combination of HAPs, based upon rolling, 12-month summations.

6. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the HAPs usage limits specified in the following table:

month(s)	Entire Facility Maximum Allowable Cumulative Usage of Individual HAP (tons)	Entire Facility Maximum Allowable Cumulative Usage of Combined HAP (tons)
1	0.81	1.98
1-2	1.63	3.96
1-3	2.44	5.93
1-4	3.25	7.91
1-5	4.01	9.89
1-6	4.88	11.87
1-7	5.69	13.84
1-8	6.51	15.82
1-9	7.32	17.80
1-10	8.13	19.78
1-11	8.95	21.75
1-12	9.76	23.73

7. After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual HAPs usage limit shall be based upon a rolling, 12-month summation.

* This assumes that the HAPs emitted are the same as the amount of HAPs used, since all HAPs used evaporate.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain Material Safety Data Sheets (MSDS) for each adhesive, thinner, and cleanup material employed at this facility.

2. The permittee shall maintain records, on a monthly basis, for emissions unit R001:
 - a. the name and identification number of each adhesive, thinner, and cleanup material employed;
 - b. the number of gallons of each adhesive, thinner, and cleanup material employed;
 - c. the total VOC content, in pounds of VOC per gallon, of each adhesive, thinner, and cleanup material employed; and
 - d. the calculated total VOC emission rates from all adhesives, thinners, and cleanup materials employed, in pounds per hour.
3. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the adhesive usage for each month; and
 - b. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the adhesive usage figures.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative adhesive usage for each calendar month.

4. The permittee shall, on a monthly basis, calculate and record for the entire facility (R001, R002, R003, and R004) the VOC usage rates from all adhesives, thinners, and cleanup materials employed, in tons.
5. The permit to install for this emissions unit (R001) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: isopropyl alcohol

TLV (mg/m3): 491.3

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Maximum Hourly Emission Rate (lbs/hr): 50

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 3,934

MAGLC (ug/m3): 11,698

6. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

7. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

Emissions Unit ID: R001

- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Director (the Akron Regional Air Quality Management District) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the Akron Regional Air Quality Management District) within 30 days following the end of the calendar month.
2. The permittee shall submit annual reports which specify the following:
 - a. VOC emissions, in tons, for R001;
 - b. adhesive usage, in gallons, for R001; and
 - c. VOC, total HAP and individual HAP emissions, in tons, for R001, R002, R003, and R004.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitations in Permit to Install #16-01972 shall be determined in accordance with the following methods:

- a. Emission Limitation:

42.3 pounds per hour, and 63.45 tons per year VOC

Applicable Compliance Method:

Compliance with the pound per hour limitation shall be determined by multiplying the maximum weight percent of solvent in the adhesive by the maximum production rate, or use OAC rule 3745-21-10(C). No recordkeeping is required for usage rates, because the

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pound per hour limitation is based upon maximum potential hourly usage.

To comply with the ton per year limitation, multiply the VOC content by the adhesive usage limit of 45,000 gallons per year, and divide by the conversion factor of 2000 pounds per ton.

b. Emission Limitation:

42.3 pounds per hour, and 61.83 tons per year of acetone

Applicable Compliance Method:

The OC content is calculated by multiplying the organic solvent content of the adhesive by the volume percentage of the organic compound component by the density of the organic compound component. Compliance with the pound per hour limitation shall be determined by multiplying the OC content in the adhesive by the maximum production rate, or use OAC rule 3745-21-10(C). No recordkeeping is required for usage rates, because the pound per hour limitation is based upon maximum potential hourly usage.

To comply with the ton per year limitation, multiply the OC content by the adhesive usage limit of 45,000 gallons per year, and divide by the conversion factor of 2000 pounds per ton.

c. Emission Limitation:

90.88 TPY VOC for entire facility, based upon a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be based on the recordkeeping requirements as specified in C.2, C.3, and in C.4 for emissions unit R001; and in C.2, C.4, and C.5 for emissions units R002, R003, and R004.

d. Emission Limitation:

23.73 TPY of all HAPs for entire facility, based upon a rolling, 12-month summation

Applicable Compliance Method:

Emissions Unit ID: **R001**

No HAPs are used in R001. Therefore, no recordkeeping is applicable for HAPs in this emissions unit. Compliance with the combined HAPs limitations for the entire facility shall be based on the recordkeeping requirements for emissions units R002, R003, and R004.

e. Emission Limitation:

9.76 TPY of any individual HAP for entire facility, based upon a rolling, 12-month summation

Applicable Compliance Method:

No HAPs are used in R001. Therefore, no recordkeeping is applicable for HAPs in this emissions unit. Compliance with the individual HAPs limitations for the entire facility shall be based on the recordkeeping requirements for emissions units R002, R003, and R004.

2. Compliance with Operational Restriction B.2 in Permit to Install #16-1972 shall be determined in accordance with the following method:

a. Operational Restriction:

The maximum annual adhesive usage for emissions unit R001 shall not exceed 45,000 gallons, based upon a rolling, 12-month summation of the adhesive usage.

Applicable Compliance Method:

Compliance shall be based on the recordkeeping requirements as specified in C.3.

F. Miscellaneous Requirements

1. This permit to install shall supersede all the air pollution control requirements for these emissions units previously contained in permit to install number 16-1382, as issued on September 8, 1994 and as modified on January 27, 1999.
2. The following terms and conditions are federally enforceable, pursuant to OAC rule 3745-35-07: A.1, A.2.c, A.2.d, B, C.1, C.2, C.3, C.4, D, E, and F.1

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

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>
Adhesive booth #1 (modification)	OAC rule 3745-31-05(A)(3)	See A.2.a through A.2.e, and C.7 below.
	OAC rule 3745-31-05(D) Synthetic Minor to avoid Title V and to avoid Prevention of Significant Deterioration (PSD)	See A.2.f, and B.2 through B.7 below.
	OAC rule 3745-21-07(G)(2)	Exempt from the requirements of this rule pursuant to term B.1 below.

2. Additional Terms and Conditions

- 2.a Volatile organic compound emissions for emissions unit R002 shall not exceed 3.96 pounds per hour, nor 6.19 tons per year.
- 2.b Acetone emissions for emissions unit R002 shall not exceed 3.96 pounds per hour, nor 4.03 tons per year.
- 2.c Hexane emissions for emissions unit R002 shall not exceed 3.12 pounds per hour, nor 4.88 tons per year.
- 2.d Toluene emissions for emissions unit R002 shall not exceed 0.72 pounds per hour, nor 1.13 tons per year.

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- 2.e** The volatile organic compound content of each adhesive, thinner, and cleanup material employed in this emissions unit shall not exceed 3.3 pounds per gallon, as applied.
- 2.f** The combined annual emissions from the entire facility (emissions units R001, R002, R003, and R004) shall not exceed the following as rolling, 12-month summations:

90.88 tons of volatile organic compounds (VOC);
 23.73 tons of all hazardous air pollutants (HAP); and
 9.76 tons of any individual HAP.

B. Operational Restrictions

- The permittee shall not employ any photochemically reactive materials, as defined in OAC 3745-21-01(C)(5), in this emissions unit.
- The maximum annual adhesive usage for emissions unit R002 shall not exceed 3,750 gallons, based upon a rolling, 12-month summation of the adhesive usage.
- To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the maximum allowable adhesive usage specified in the following table:

month(s)	Maximum Allowable Adhesive Usage for R002 only (gallons)
1	313
1-2	625
1-3	938
1-4	1,250
1-5	1,563
1-6	1,875
1-7	2,188
1-8	2,500
1-9	2,813
1-10	3,125
1-11	3,438
1-12	3,750

- After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual adhesive usage limitation for emissions unit R002 shall be based upon

a rolling, 12-month summation of the adhesive usage for emissions unit R002, in gallons.

5. The total allowable usage [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from this facility shall be less than 10* TPY for any single HAP and 25* TPY for any combination of HAPs, based upon rolling, 12-month summations.
6. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the HAPs usage limits specified in the following table:

month(s)	Entire Facility Maximum Allowable Cumulative Usage of Individual HAP (tons)	Entire Facility Maximum Allowable Cumulative Usage of Combined HAP (tons)
1	0.81	1.98
1-2	1.63	3.96
1-3	2.44	5.93
1-4	3.25	7.91
1-5	4.01	9.89
1-6	4.88	11.87
1-7	5.69	13.84
1-8	6.51	15.82
1-9	7.32	17.80
1-10	8.13	19.78
1-11	8.95	21.75
1-12	9.76	23.73

7. After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual HAPs usage limit shall be based upon a rolling, 12-month summation.

* This assumes that the HAPs emitted are the same as the amount of HAPs used, since all HAPs used evaporate.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain Material Safety Data Sheets (MSDS) for each adhesive, thinner, and cleanup material employed at this facility.
2. The permittee shall maintain records, on a monthly basis, for emissions unit R002:

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- a. the name and identification number of each adhesive, thinner, and cleanup material employed;
 - b. the number of gallons of each adhesive, thinner, and cleanup material employed;
 - c. the total VOC content, in pounds of VOC per gallon, of each adhesive, thinner, and cleanup material employed;
 - d. the calculated total VOC emission rates from all adhesives, thinners, and cleanup materials employed, in pounds per hour.
3. The permittee shall maintain records regarding HAPs emissions, on a monthly basis, for emissions unit R002:
 - a. the name and identification number of each adhesive, thinner, and cleanup material employed;
 - b. the number of gallons of each adhesive, thinner, and cleanup material employed;
 - c. the total hexane content, in pounds of hexane per gallon, of each adhesive, thinner, and cleanup material employed;
 - d. the total toluene content, in pounds of toluene per gallon, of each adhesive, thinner, and cleanup material employed;
 - e. the calculated total hexane emission rates from all adhesives, thinners, and cleanup materials employed, in pounds per hour.
 - f. the calculated total toluene emission rates from all adhesives, thinners, and cleanup materials employed, in pounds per hour.
4. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the adhesive usage for each month; and
 - b. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the adhesive usage figures.

Also, during the first 12 calendar months of operation following the issuance of this permit, the

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permittee shall record the cumulative adhesive usage for each calendar month.

5. The permittee shall, on a monthly basis, calculate and record for the entire facility (R001, R002, R003, and R004) the VOC usage rates from all adhesives, thinners, and cleanup materials employed, in tons.
6. The permittee shall, on a monthly basis, calculate and record for the facility (R002, R003, and R004) the individual HAP usage rates, and combined HAP usage rates, from all adhesives, thinners, and cleanup materials employed, in tons.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Akron Regional Air Quality Management District contact. This information does not have to be kept on a line-by-line basis.

This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

7. The permit to install for this emissions unit (R002) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: hexane

TLV (mg/m³): 176.2

Maximum Hourly Emission Rate (lbs/hr): 25

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m³): 3,456

MAGLC (ug/m³): 4,195

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will

Emissions Unit ID: R002

still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
8. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Director (the Akron Regional Air Quality Management District) in writing of any monthly record showing the use of noncomplying coatings. The notification shall

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include a copy of such record and shall be sent to the Director (the Akron Regional Air Quality Management District) within 30 days following the end of the calendar month.

2. The permittee shall submit annual reports which specify the following:
 - a. VOC, hexane and toluene emissions, in tons, for R002;
 - b. adhesive usage, in gallons, for R002; and
 - c. VOC, total HAP and individual HAP emissions, in tons, for R001, R002, R003, and R004.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitations in Permit to Install #16-01972 shall be determined in accordance with the following methods:

- a. Emission Limitation:

3.96 pounds per hour, and 6.19 tons per year VOC

Applicable Compliance Method:

Compliance with the pound per hour limitation shall be determined by multiplying the maximum weight percent of solvent in the adhesive by the maximum production rate, or use OAC rule 3745-21-10(C). No recordkeeping is required for usage rates, because the pound per hour limitation is based upon maximum potential hourly usage.

To comply with the ton per year limitation, multiply the VOC content by the adhesive usage limit of 3,750 gallons per year, and divide by the conversion factor of 2000 pounds per ton.

- b. Emission Limitation:

3.96 pounds per hour, and 4.03 tons per year of acetone

Applicable Compliance Method:

The OC content is calculated by multiplying the organic solvent content of the adhesive by the volume percentage of the organic compound component by the density of the organic compound component. Compliance with the pound per hour limitation shall be determined by multiplying the OC content in the adhesive by the maximum production rate, or use OAC rule 3745-21-10(C). No recordkeeping is required for usage rates, because the pound per hour limitation is based upon maximum potential hourly usage.

To comply with the ton per year limitation, multiply the OC content by the adhesive usage limit of 3,750 gallons per year, and divide by the conversion factor of 2000 pounds per ton.

c. Emission Limitation:

3.12 pounds per hour, and 4.88 tons per year hexane

Applicable Compliance Method:

Compliance with the pound per hour limitation shall be demonstrated by multiplying the maximum weight percent of hexane in the adhesive by the maximum production rate, or use OAC rule 3745-21-10(C). No recordkeeping is required for usage rates, because the pound per hour limitation is based upon maximum potential hourly usage.

To comply with the ton per year limitation, multiply the hexane content by the adhesive usage limit of 3,750 gallons per year, and divide by the conversion factor of 2000 pounds per ton.

d. Emission Limitation:

0.72 pounds per hour, and 1.13 tons per year toluene

Applicable Compliance Method:

Compliance with the pound per hour limitation shall be demonstrated by multiplying the maximum weight percent of toluene in the adhesive by the maximum production rate, or use OAC rule 3745-21-10(C). No recordkeeping is required for usage rates, because the pound per hour limitation is based upon maximum potential hourly usage.

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To comply with the ton per year limitation, multiply the toluene content by the adhesive usage limit of 3,750 gallons per year, and divide by the conversion factor of 2000 pounds per ton.

e. Emission Limitation:

90.88 TPY VOC for entire facility, based upon a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be based on the recordkeeping requirements as specified in C.2, C.3, and in C.4 for emissions unit R001; and in C.2, C.4, and C.5 for emissions units R002, R003, and R004.

f. Emission Limitation:

23.73 TPY of all HAPs for entire facility, based upon a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be based on the recordkeeping requirements as specified in C.3, C.4, and in C.6 for emissions units R002, R003, and R004.

g. Emission Limitation:

9.76 TPY of any individual HAP for entire facility, based upon a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be based on the recordkeeping requirements as specified in C.3, C.4, and in C.6 for emissions units R002, R003, and R004.

2. Compliance with Operational Restriction B.2 in Permit to Install #16-1972 shall be determined in accordance with the following method:**a.** Operational Restriction:

ACCEL Group Inc
PTI Application: 16-01073
Issued

Facility ID: 1652100086

Emissions Unit ID: **R002**

The maximum annual adhesive usage for emissions unit R002 shall not exceed 3,750 gallons, based upon a rolling, 12-month summation of the adhesive usage.

Applicable Compliance Method:

Compliance shall be based on the recordkeeping requirements as specified in C.4.

F. Miscellaneous Requirements

1. This permit to install shall supersede all the air pollution control requirements for these emissions units previously contained in permit to install number 16-1382, as issued on September 8, 1994 and as modified on January 27, 1999.
2. The following terms and conditions are federally enforceable, pursuant to OAC rule 3745-35-07: A.1, A.2.e, A.2.f, B, C.1, C.2, C.3, C.4, D, E, and F.1

ACCE

PTI A

Emissions Unit ID: R003

Issued: To be entered upon final issuance**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]****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>
Adhesive booth #2 (modification)	OAC rule 3745-31-05(A)(3)	See A.2.a through A.2.e, and C.7 below.
	OAC rule 3745-31-05(D) Synthetic Minor to avoid Title V and to avoid Prevention of Significant Deterioration (PSD)	See A.2.f, and B.2 through B.7 below.
	OAC rule 3745-21-07(G)(2)	Exempt from the requirements of this rule pursuant to term B.1 below.

2. Additional Terms and Conditions

- 2.a** Volatile organic compound emissions for emissions unit R003 shall not exceed 3.96 pounds per hour, nor 6.19 tons per year.
- 2.b** Acetone emissions for emissions unit R003 shall not exceed 3.96 pounds per hour, nor 4.03 tons per year.
- 2.c** Hexane emissions for emissions unit R003 shall not exceed 3.12 pounds per hour, nor 4.88 tons per year.
- 2.d** Toluene emissions for emissions unit R003 shall not exceed 0.72 pounds per hour, nor 1.13 tons per year.

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- 2.e** The volatile organic compound content of each adhesive, thinner, and cleanup material employed in this emissions unit shall not exceed 3.3 pounds per gallon, as applied.
- 2.f** The combined annual emissions from the entire facility (emissions units R001, R002, R003, and R004) shall not exceed the following as rolling, 12-month summations:

90.88 tons of volatile organic compounds (VOC);
 23.73 tons of all hazardous air pollutants (HAP); and
 9.76 tons of any individual HAP.

B. Operational Restrictions

- The permittee shall not employ any photochemically reactive materials, as defined in OAC 3745-21-01(C)(5), in this emissions unit.
- The maximum annual adhesive usage for emissions unit R003 shall not exceed 3,750 gallons, based upon a rolling, 12-month summation of the adhesive usage.
- To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the maximum allowable adhesive usage specified in the following table:

month(s)	Maximum Allowable Adhesive Usage for R003 only (gallons)
1	313
1-2	625
1-3	938
1-4	1,250
1-5	1,563
1-6	1,875
1-7	2,188
1-8	2,500
1-9	2,813
1-10	3,125
1-11	3,438
1-12	3,750

- After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual adhesive usage limitation for emissions unit R003 shall be based upon

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a rolling, 12-month summation of the adhesive usage for emissions unit R003, in gallons.

5. The total allowable usage [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from this facility shall be less than 10* TPY for any single HAP and 25* TPY for any combination of HAPs, based upon rolling, 12-month summations.
6. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the HAPs usage limits specified in the following table:

month(s)	Entire Facility Maximum Allowable Cumulative Usage of Individual HAP (tons)	Entire Facility Maximum Allowable Cumulative Usage of Combined HAP (tons)
1	0.81	1.98
1-2	1.63	3.96
1-3	2.44	5.93
1-4	3.25	7.91
1-5	4.01	9.89
1-6	4.88	11.87
1-7	5.69	13.84
1-8	6.51	15.82
1-9	7.32	17.80
1-10	8.13	19.78
1-11	8.95	21.75
1-12	9.76	23.73

7. After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual HAPs usage limit shall be based upon a rolling, 12-month summation.

* This assumes that the HAPs emitted are the same as the amount of HAPs used, since all HAPs used evaporate.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain Material Safety Data Sheets (MSDS) for each adhesive, thinner, and cleanup material employed at this facility.
2. The permittee shall maintain records, on a monthly basis, for emissions unit R003:

- a. the name and identification number of each adhesive, thinner, and cleanup material employed;
 - b. the number of gallons of each adhesive, thinner, and cleanup material employed;
 - c. the total VOC content, in pounds of VOC per gallon, of each adhesive, thinner, and cleanup material employed;
 - d. the calculated total VOC emission rates from all adhesives, thinners, and cleanup materials employed, in pounds per hour.
3. The permittee shall maintain records regarding HAPs emissions, on a monthly basis, for emissions unit R003:
- a. the name and identification number of each adhesive, thinner, and cleanup material employed;
 - b. the number of gallons of each adhesive, thinner, and cleanup material employed;
 - c. the total hexane content, in pounds of hexane per gallon, of each adhesive, thinner, and cleanup material employed;
 - d. the total toluene content, in pounds of toluene per gallon, of each adhesive, thinner, and cleanup material employed;
 - e. the calculated total hexane emission rates from all adhesives, thinners, and cleanup materials employed, in pounds per hour.
 - f. the calculated total toluene emission rates from all adhesives, thinners, and cleanup materials employed, in pounds per hour.
4. The permittee shall maintain monthly records of the following information for this emissions unit:
- a. the adhesive usage for each month; and
 - b. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the adhesive usage figures.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative adhesive usage for each calendar month.

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5. The permittee shall, on a monthly basis, calculate and record for the entire facility (R001, R002, R003, and R004) the VOC usage rates from all adhesives, thinners, and cleanup materials employed, in tons.
6. The permittee shall, on a monthly basis, calculate and record for the facility (R002, R003, and R004) the individual HAP usage rates, and combined HAP usage rates, from all adhesives, thinners, and cleanup materials employed, in tons.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Akron Regional Air Quality Management District contact. This information does not have to be kept on a line-by-line basis.

This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

7. The permit to install for this emissions unit (R003) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: hexane

TLV (mg/m³): 176.2

Maximum Hourly Emission Rate (lbs/hr): 25

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m³): 3,456

MAGLC (ug/m³): 4,195

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

Emissions Unit ID: R003

not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
8. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Director (the Akron Regional Air Quality Management District) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the Akron Regional Air Quality

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Management District) within 30 days following the end of the calendar month.

2. The permittee shall submit annual reports which specify the following:
 - a. VOC, hexane and toluene emissions, in tons, for R003;
 - b. adhesive usage, in gallons, for R003; and
 - c. VOC, total HAP and individual HAP emissions, in tons, for R001, R002, R003, and R004.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitations in Permit to Install #16-01972 shall be determined in accordance with the following methods:

- a. Emission Limitation:

3.96 pounds per hour, and 6.19 tons per year VOC

Applicable Compliance Method:

Compliance with the pound per hour limitation shall be determined by multiplying the maximum weight percent of solvent in the adhesive by the maximum production rate, or use OAC rule 3745-21-10(C). No recordkeeping is required for usage rates, because the pound per hour limitation is based upon maximum potential hourly usage.

To comply with the ton per year limitation, multiply the VOC content by the adhesive usage limit of 3,750 gallons per year, and divide by the conversion factor of 2000 pounds per ton.

- b. Emission Limitation:

3.96 pounds per hour, and 4.03 tons per year of acetone

Applicable Compliance Method:

Emissions Unit ID: R003

The OC content is calculated by multiplying the organic solvent content of the adhesive by the volume percentage of the organic compound component by the density of the organic compound component. Compliance with the pound per hour limitation shall be determined by multiplying the OC content in the adhesive by the maximum production rate, or use OAC rule 3745-21-10(C). No recordkeeping is required for usage rates, because the pound per hour limitation is based upon maximum potential hourly usage.

To comply with the ton per year limitation, multiply the OC content by the adhesive usage limit of 3,750 gallons per year, and divide by the conversion factor of 2000 pounds per ton.

c. Emission Limitation:

3.12 pounds per hour, and 4.88 tons per year hexane

Applicable Compliance Method:

Compliance with the pound per hour limitation shall be demonstrated by multiplying the maximum weight percent of hexane in the adhesive by the maximum production rate, or use OAC rule 3745-21-10(C). No recordkeeping is required for usage rates, because the pound per hour limitation is based upon maximum potential hourly usage.

To comply with the ton per year limitation, multiply the hexane content by the adhesive usage limit of 3,750 gallons per year, and divide by the conversion factor of 2000 pounds per ton.

d. Emission Limitation:

0.72 pounds per hour, and 1.13 tons per year toluene

Applicable Compliance Method:

Compliance with the pound per hour limitation shall be demonstrated by multiplying the maximum weight percent of toluene in the adhesive by the maximum production rate, or use OAC rule 3745-21-10(C). No recordkeeping is required for usage rates, because the pound per hour limitation is based upon maximum potential hourly usage.

To comply with the ton per year limitation, multiply the toluene content by the adhesive usage limit of 3,750 gallons per year, and divide by the conversion factor of 2000 pounds

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per ton.

e. Emission Limitation:

90.88 TPY VOC for entire facility, based upon a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be based on the recordkeeping requirements as specified in C.2, C.3, and in C.4 for emissions unit R001; and in C.2, C.4, and C.5 for emissions units R002, R003, and R004.

f. Emission Limitation:

23.73 TPY of all HAPs for entire facility, based upon a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be based on the recordkeeping requirements as specified in C.3, C.4, and in C.6 for emissions units R002, R003, and R004.

g. Emission Limitation:

9.76 TPY of any individual HAP for entire facility, based upon a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be based on the recordkeeping requirements as specified in C.3, C.4, and in C.6 for emissions units R002, R003, and R004.

2. Compliance with Operational Restriction B.2 in Permit to Install #16-1972 shall be determined in accordance with the following method:

a. Operational Restriction:

The maximum annual adhesive usage for emissions unit R002 shall not exceed 3,750 gallons, based upon a rolling, 12-month summation of the adhesive usage.

ACCE

PTI A

Emissions Unit ID: **R003**

Issued: To be entered upon final issuance

Applicable Compliance Method:

Compliance shall be based on the recordkeeping requirements as specified in C.4.

F. Miscellaneous Requirements

1. This permit to install shall supersede all the air pollution control requirements for these emissions units previously contained in permit to install number 16-1382, as issued on September 8, 1994 and as modified on January 27, 1999.
2. The following terms and conditions are federally enforceable, pursuant to OAC rule 3745-35-07: A.1, A.2.e, A.2.f, B, C.1, C.2, C.3, C.4, D, E, and F.1

ACCE

PTI A

Emissions Unit ID: R004

Issued: To be entered upon final issuance**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]****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>
Finished Parts Wiping (new addition)	OAC rule 3745-31-05(A)(3)	See A.2.a through A.2.e, and C.7 below.
	OAC rule 3745-31-05(D) Synthetic Minor to avoid Title V and to avoid Prevention of Significant Deterioration (PSD)	See A.2.f, and B.2 through B.7 below.
	OAC rule 3745-21-07(G)(2)	Exempt from the requirements of this rule pursuant to term B.1 below.

2. Additional Terms and Conditions

- 2.a** Volatile organic compound emissions for emissions unit R004 shall not exceed 10.04 pounds per hour, nor 15.05 tons per year.
- 2.b** Toluene emissions for emissions unit R004 shall not exceed 2.07 pounds per hour, nor 3.11 tons per year.
- 2.c** Methyl Ethyl Ketone (MEK) emissions for emissions unit R004 shall not exceed 4.73 pounds per hour, nor 7.09 tons per year.
- 2.d** Methyl Isobutyl Ketone (MIBK) emissions for emissions unit R004 shall not exceed 1.01 pounds per hour, nor 1.51 tons per year.

Emissions Unit ID: **R004**

- 2.e** The volatile organic compound content of each adhesive, thinner, and cleanup material employed in this emissions unit shall not exceed 6.69 pounds per gallon, as applied.
- 2.f** The combined annual emissions from the entire facility (emissions units R001, R002, R003, and R004) shall not exceed the following as rolling, 12-month summations:
- 90.88 tons of volatile organic compounds (VOC);
 23.73 tons of all hazardous air pollutants (HAP); and
 9.76 tons of any individual HAP.

B. Operational Restrictions

1. The permittee shall not employ any photochemically reactive materials, as defined in OAC 3745-21-01(C)(5), in this emissions unit.
2. The maximum annual adhesive usage for emissions unit R004 shall not exceed 4,500 gallons, based upon a rolling, 12-month summation of the adhesive usage.
3. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the maximum allowable adhesive usage specified in the following table:

month(s)	Maximum Allowable Adhesive Usage for R004 only (gallons)
1	375
1-2	750
1-3	1,125
1-4	1,500
1-5	1,875
1-6	2,250
1-7	2,625
1-8	3,000
1-9	3,375
1-10	3,750
1-11	4,125
1-12	4,500

4. After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual adhesive usage limitation for emissions unit R004 shall be based upon

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a rolling, 12-month summation of the adhesive usage for emissions unit R004, in gallons.

5. The total allowable usage [as defined by OAC rule 3745-77-01(BB)] of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from this facility shall be less than 10* TPY for any single HAP and 25* TPY for any combination of HAPs, based upon rolling, 12-month summations.
6. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the HAPs usage limits specified in the following table:

month(s)	Entire Facility Maximum Allowable Cumulative Usage of Individual HAP (tons)	Entire Facility Maximum Allowable Cumulative Usage of Combined HAP (tons)
1	0.81	1.98
1-2	1.63	3.96
1-3	2.44	5.93
1-4	3.25	7.91
1-5	4.01	9.89
1-6	4.88	11.87
1-7	5.69	13.84
1-8	6.51	15.82
1-9	7.32	17.80
1-10	8.13	19.78
1-11	8.95	21.75
1-12	9.76	23.73

7. After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual HAPs usage limit shall be based upon a rolling, 12-month summation.

* This assumes that the HAPs emitted are the same as the amount of HAPs used, since all HAPs used evaporate.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain Material Safety Data Sheets (MSDS) for each adhesive, thinner, and cleanup material employed at this facility.

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2. The permittee shall maintain records, on a monthly basis, for emissions unit R004:
 - a. the name and identification number of each adhesive, thinner, and cleanup material employed;
 - b. the number of gallons of each adhesive, thinner, and cleanup material employed;
 - c. the total VOC content, in pounds of VOC per gallon, of each adhesive, thinner, and cleanup material employed;
 - d. the calculated total VOC emission rates from all adhesives, thinners, and cleanup materials employed, in pounds per hour.

3. The permittee shall maintain records regarding HAPs emissions, on a monthly basis, for emissions unit R004:
 - a. the name and identification number of each adhesive, thinner, and cleanup material employed;
 - b. the number of gallons of each adhesive, thinner, and cleanup material employed;
 - c. the total toluene content, in pounds of toluene per gallon, of each adhesive, thinner, and cleanup material employed;
 - d. the total MEK content, in pounds of MEK per gallon, of each adhesive, thinner, and cleanup material employed;
 - e. the MIBK content, in pounds of MIBK per gallon, of each adhesive, thinner, and cleanup material employed; and
 - f. the calculated total toluene emission rates from all adhesives, thinners, and cleanup materials employed, in pounds per hour.
 - g. the calculated total MEK emission rates from all adhesives, thinners, and cleanup materials employed, in pounds per hour.
 - h. the calculated total MIBK emission rates from all adhesives, thinners, and cleanup materials employed, in pounds per hour.

4. The permittee shall maintain monthly records of the following information for this emissions unit:

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- a. the adhesive usage for each month; and
- b. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the adhesive usage figures.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative adhesive usage for each calendar month.

5. The permittee shall, on a monthly basis, calculate and record for the entire facility (R001, R002, R003, and R004) the VOC usage rates from all adhesives, thinners, and cleanup materials employed, in tons.
6. The permittee shall, on a monthly basis, calculate and record for the facility (R002, R003, and R004) the individual HAP usage rates, and combined HAP usage rates, from all adhesives, thinners, and cleanup materials employed, in tons.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Akron Regional Air Quality Management District contact. This information does not have to be kept on a line-by-line basis.

This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

7. The permit to install for this emissions unit (R004) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: light aliphatic solvent naphtha

TLV (mg/m3): 52.4

Maximum Hourly Emission Rate (lbs/hr): 9

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1,238

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MAGLC (ug/m3): 1,247.6

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

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

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

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

D. Reporting Requirements

1. The permittee shall notify the Director (the Akron Regional Air Quality Management District) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the Akron Regional Air Quality Management District) within 30 days following the end of the calendar month.
2. The permittee shall submit annual reports which specify the following:
 - a. VOC, toluene, MEK, and MIBK emissions, in tons, for R004;
 - b. adhesive usage, in gallons, for R004; and
 - c. VOC, total HAP and individual HAP emissions, in tons, for R001, R002, R003, and R004.

These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitations in Permit to Install #16-01972 shall be determined in accordance with the following methods:

- a. Emission Limitation:

10.04 pounds per hour, and 15.05 tons per year VOC

Applicable Compliance Method:

Compliance with the pound per hour limitation shall be determined by multiplying the maximum weight percent of solvent in the adhesive by the maximum production rate, or use OAC rule 3745-21-10(C). No recordkeeping is required for usage rates, because the pound per hour limitation is based upon maximum potential hourly usage.

To comply with the ton per year limitation, multiply the VOC content by the adhesive usage limit of 4,500 gallons per year, and divide by the conversion factor of 2000 pounds per ton.

b. Emission Limitation:

2.07 pounds per hour, and 3.11 tons per year toluene

Applicable Compliance Method:

Compliance with the pound per hour limitation shall be determined by multiplying the maximum weight percent of toluene in the adhesive by the maximum production rate, or use OAC rule 3745-21-10(C). No recordkeeping is required for usage rates, because the pound per hour limitation is based upon maximum potential hourly usage.

To comply with the ton per year limitation, multiply the toluene content by the adhesive usage limit of 4,500 gallons per year, and divide by the conversion factor of 2000 pounds per ton.

c. Emission Limitation:

4.73 pounds per hour, and 7.09 tons per year MEK

Applicable Compliance Method:

Compliance with the pound per hour limitation shall be determined by multiplying the maximum weight percent of MEK in the adhesive by the maximum production rate, or use OAC rule 3745-21-10(C). No recordkeeping is required for usage rates, because the pound per hour limitation is based upon maximum potential hourly usage.

To comply with the ton per year limitation, multiply the MEK content by the adhesive usage limit of 4,500 gallons per year, and divide by the conversion factor of 2000 pounds per ton.

d. Emission Limitation:

1.01 pounds per hour, and 1.51 tons per year MIBK

Applicable Compliance Method:

Compliance with the pound per hour limitation shall be determined by multiplying the maximum weight percent of MIBK in the adhesive by the maximum production rate, or use OAC rule 3745-21-10(C). No recordkeeping is required for usage rates, because the pound per hour limitation is based upon maximum potential hourly usage.

To comply with the ton per year limitation, multiply the MIBK content by the adhesive usage limit of 4,500 gallons per year, and divide by the conversion factor of 2000 pounds per ton.

e. Emission Limitation:

90.88 TPY VOC for entire facility, based upon a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be based on the recordkeeping requirements as specified in C.2, C.3, and in C.4 for emissions unit R001; and in C.2, C.4, and C.5 for emissions units R002, R003, and R004.

f. Emission Limitation:

23.73 TPY of all HAPs for entire facility, based upon a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be based on the recordkeeping requirements as specified in C.3, C.4, and in C.6 for emissions units R002, R003, and R004.

g. Emission Limitation:

9.76 TPY of any individual HAP for entire facility, based upon a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be based on the recordkeeping requirements as specified in C.3, C.4, and in C.6 for emissions units R002, R003, and R004.

2. Compliance with Operational Restriction B.2 in Permit to Install #16-1972 shall be determined in accordance with the following method:

a. Operational Restriction:

The maximum annual adhesive usage for emissions unit R004 shall not exceed 4,500 gallons, based upon a rolling, 12-month summation of the adhesive usage.

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Applicable Compliance Method:

Compliance shall be based on the recordkeeping requirements as specified in C.4.

F. Miscellaneous Requirements

1. This permit to install shall supersede all the air pollution control requirements for these emissions units previously contained in permit to install number 16-1382, as issued on September 8, 1994 and as modified on January 27, 1999.
2. The following terms and conditions are federally enforceable, pursuant to OAC rule 3745-35-07: A.1, A.2.e, A.2.f, B, C.1, C.2, C.3, C.4, D, E, and F.1