

**A. Source Description**

Eaton Hydraulic Operations (Eaton) in Aurora, Ohio is a manufacturer of extruded hoses and tubing. We also manufacture some products with a braided reinforcement. The manufacture of braided/reinforced hoses requires the use of VOC or HAP-based adhesives.

The manufacture of extruded hoses will emit particulate matter and volatile organic chemicals (VOCs). For the purposes of potential-to-emit (PTE) calculations, VOCs emitted from the extruders are assumed to be hazardous air pollutants (HAPs).

The construction of reinforced tubing requires the addition of small amounts of adhesives during the braiding. One of the products currently used by Eaton is a VOC (n-methyl pyrrolidone, NMP) at 91% by weight and the other adhesive product, moisture-cured urethane (MCU) containing methylene chloride at 20% by weight. These products are and can be used on any of 13 braiders identified as MR11 units and either of two beam servers. A third product is a water-based adhesive with no VOCs.

**B. Facility Emissions and Attainment Status**

Per the revised PTE table (attached), emissions of concern with the potential to trigger Title V reporting are HAPs. The PTE for methylene chloride (single HAP) is 47.68 tons per year (tpy). The Title V threshold is 10 tpy. The aggregate HAPs facility PTE, including the extruders, is 49.88 tpy. The Title V threshold for a combination of HAPs is 25 tpy. Please reference the attached tables.

Pollutant: Methylene Chloride

Sources: MR11 Machines and Beam Servers

Actual Emissions(\*1): 0.484 – 4.54 tons per year (years 1994 – 2001)

Potential Emissions: 47.68 tpy

Restricted PTE Request: 9.95 tpy

(\*1) This value reports the range of methylene chloride contained in the MCU purchases for the years 1994 through 2001. For this presentation, we are assuming that all methylene chloride is emitted at the facility, while in actuality, some MCU adhesive is sent off-site for treatment/disposal.

Pollutant: Combined HAPs

Sources: MR11 Machines, Beam Servers and Extruders

Actual Emissions: 4.23 tons (Year 2001)

Potential Emissions: 49.88

Restricted PTE Request (\*2): 24 tpy

(\*2) By restricting the PTE of methylene chloride to 9.95 tpy, the PTE for combined HAPs based on current operations is 12.15 tpy.

**C. Source Emissions**

Given that the source of the methylene chloride is a single adhesive (moisture-cured urethane, MCU), EATON proposes to limit the total amount of MCU consumed at the facility in any rolling 12-months to 99,500 pounds. This will limit our actual and PTE to 9.95 tons of methylene chloride (99,500 lbs. MCU x 20% MeCl / 2000 lb/t = 9.95 tpy MeCl).

The attached PTE table for primary sources and the facility present information relative to this synthetic minor request, specifically for a single HAP (methylene chloride) and aggregate HAPs.

EATON is requesting a facility-wide limitation for single HAP and aggregate HAPs which will give us operational flexibility between the MR11 machines and the beam servers and braiders. (Currently and historically, the Karg and Wardwell Braiders have not used HAP-adhesives.) The record-keeping burdens for tracking the usage of MCU on individual machines will be burdensome and given that total HAP adhesive consumption for the facility is readily known (releases from purchasing into production), the amount of HAPs

emitted is also known.

EATON also proposes to restrict the operating MeCl coating usage to 10050 gallons per year as a facility-wide restriction of the Beam Servers when running specific products in order to comply with OAC 3745-21-07(G), regarding limiting the emissions of organic material from an individual source to 40 pounds per day. Operating time is monitored and recorded, real time, by the VOC program, Overall Equipment Effectiveness.

**D. Conclusion**

By controlling and tracking the amount of HAP adhesive usage, EATON can effectively control and limit the amount of hazardous air pollutants emitted from our facility to remain a synthetic minor and avoid Title V permitting and federal MACT standards.

In addition, in order to comply with OAC 3745-21-07(G), EATON will restrict hours of operation of the Beam Servers to 19.5 hours per day when running the "worst case" emitters as presented in the attached PTE Calculations attachment and the revised PTE Table.

EATON Corporation's Aurora, Ohio facility believes that these activities will allow and enable us to operate below Title V and MACT thresholds.



State of Ohio Environmental Protection Agency

RE: DRAFT PERMIT TO INSTALL  
PORTAGE COUNTY

CERTIFIED MAIL

Street Address:

Mailing Address:

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

Lazarus Gov.  
Center

Application No: 16-02478

Fac ID: 1667020046

DATE: 3/13/2007

Eaton Corp  
Dan Demboski  
115 Lena Dr  
Aurora, OH 44202

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install 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, 43216-1049.

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 **\$8000** 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.

Sincerely,

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

CC: USEPA

ARAQMD

Akron Metro Area Trans. Study

WV

PA

PORTAGE  
COUNTY

PUBLIC NOTICE

ISSUANCE OF DRAFT PERMIT TO INSTALL **16-02478** FOR AN AIR CONTAMINANT SOURCE FOR

## **Eaton Corp**

On 3/13/2007 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Eaton Corp**, located at **115 Lena Dr, Aurora, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 16-02478:

### **Various Braiders, Tool Cleaning Ovens, Producing Reinforced Tubing/Hoses.**

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

Lynn Malcolm, Akron Regional Air Quality Management District, 146 South High Street, Room 904, Akron, OH 44308 [(330)375-2480]



**Permit To Install  
Terms and Conditions**

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

**DRAFT PERMIT TO INSTALL 16-02478**

Application Number: 16-02478  
Facility ID: 1667020046  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Eaton Corp  
Person to Contact: Dan Demboski  
Address: 115 Lena Dr  
Aurora, OH 44202

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

**115 Lena Dr  
Aurora, Ohio**

Description of proposed emissions unit(s):

**Various Braiders, Tool Cleaning Ovens, Producing Reinforced Tubing/Hoses.**

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

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Chris Korleski  
Director

Eaton Corp

PTI Application: 16-02478

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 1667020046

## **A. Permit to Install General Terms and Conditions**

### **1. Compliance Requirements**

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

### **2. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly 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,

**Eaton Corp**

**Facility ID: 1667020046**

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**Issued: To be entered upon final issuance**

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.

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## **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 cannot meet the requirements of this permit or cannot meet applicable standards.

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

## **10. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

## **11. Applicability**

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

## **12. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available

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

### 14. Construction Compliance Certification

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

### 15. Fees

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

## B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC (potential To Emit)	67.33
PE (Potential To Emit)	7.37
MeCl	9.95

**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.

**Operations, Property, and/or Equipment - (N001) - Screw Cleaner Burn-off Oven**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See sections A.2.a and A.2.b below.
OAC rule 3745-17-07(A)	Visible particulate emissions(PE) from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
OAC rule 3745-17-09(B)	0.20 pound of PE per 100 pounds of liquid, semi-solid, or solid refuse and salvageable materials charged
OAC rule 3745-17-09(C)	This incinerator, including all associated equipment and grounds, shall be designed, operated and maintained so as to prevent the emission of objectionable odors.

**2. Additional Terms and Conditions**

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE from this air contaminant source since the calculated annual emission rate for PE is less than ten tons per year taking into account the federally enforceable rule limit of 0.20 pound particulate per 100 pounds of liquid, semisolid or solid refuse and salvageable material charged to the incinerator under OAC rule 3745-17-09(C).
- 2.b The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the uncontrolled OC, NO<sub>x</sub>, CO and SO<sub>2</sub> emissions from this air contaminant source since the potential to emit for OC, NO<sub>x</sub>, CO and SO<sub>2</sub> is each less than ten tons per year.
- 2.c This emissions unit is exempt from the requirements of OAC rule 3745-18-06 because natural gas is the only fuel burned.

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**B. Operational Restrictions**

1. The permittee shall not charge this emissions unit with an "infectious agent" as defined in OAC rule 3745-75-01(B)(19).

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

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

**D. Reporting Requirements**

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month periods.

**E. Testing Requirements**

1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
  
PE shall not exceed 0.20 pound per 100 pounds of liquid, semisolid or solid refuse and salvageable material charged to the incinerator.

Applicable Compliance Method:

**Eaton Corp**

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**Facility ID: 1667020046**

**Emissions Unit ID: N001**

If required, compliance with this mass emission limitation shall be based on stack testing per OAC rule 3745-17-03(B)(8), (USEPA Method 1-5, 40 CFR 60, Appendix A).

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b. Emission Limitation:

Visible PE from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance with this Visible PE limitation shall be determined by USEPA Method 9 (40 CFR Part 60, Appendix A).

**F. Miscellaneous Requirements**

1. A copy of these terms and conditions shall be visibly posted near the incinerator.
2. This incinerator shall be operated only by adequately trained personnel.

**Issued: To be entered upon final issuance**

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

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

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

**Operations, Property, and/or Equipment - (N002) - Tool Room Burn-off Oven**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See sections A.2.a and A.2.b below.
OAC rule 3745-17-07(A)	Visible particulate emissions(PE) from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
OAC rule 3745-17-09(B)	0.20 pound of PE per 100 pounds of liquid, semi-solid, or solid refuse and salvageable materials charged
OAC rule 3745-17-09(C)	This incinerator, including all associated equipment and grounds, shall be designed, operated and maintained so as to prevent the emission of objectionable odors.

**2. Additional Terms and Conditions**

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE from this air contaminant source since the calculated annual emission rate for PE is less than ten tons per year taking into account the federally enforceable rule limit of 0.20 pound particulate per 100 pounds of liquid, semisolid or solid refuse and salvageable material charged to the incinerator under OAC rule 3745-17-09(C).
- 2.b The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the uncontrolled OC, NO<sub>x</sub>, CO and SO<sub>2</sub> emissions from this air contaminant source since the potential to emit for OC, NO<sub>x</sub>, CO and SO<sub>2</sub> is each less than ten tons per year.
- 2.c This emissions unit is exempt from the requirements of OAC rule 3745-18-06 because natural gas is the only fuel burned.

**B. Operational Restrictions**

1. The permittee shall not charge this emissions unit with an "infectious agent" as defined in OAC rule 3745-75-01(B)(19).

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

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

**D. Reporting Requirements**

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month periods.

**E. Testing Requirements**

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

- a. Emission Limitation:

PE shall not exceed 0.20 pound per 100 pounds of liquid, semisolid or solid refuse and salvageable material charged to the incinerator.

Applicable Compliance Method:

Emissions Unit ID: **N002**

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If required, compliance with this mass emission limitation shall be based on stack testing per OAC rule 3745-17-03(B)(8), (USEPA Method 1-5, 40 CFR 60, Appendix A).

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b. Emission Limitation:

Visible PE from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance with this Visible PE limitation shall be determined by USEPA Method 9 (40 CFR Part 60, Appendix A).

**F. Miscellaneous Requirements**

1. A copy of these terms and conditions shall be visibly posted near the incinerator.
2. This incinerator shall be operated only by adequately trained personnel.

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

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

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

**Operations, Property, and/or Equipment - (P001) - Lapper 1, Application of reinforcing braid to hoses and plastic tubing using adhesives. Consisting of hose reels, adhesive applicators, braiders, capstan puller and reel coilers.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See sections A.2.a and A.2.b below.
OAC rule 3745-31-05(C)	See B.1.
OAC rule 3745-17-07(A)	Visible particulate emissions (PE) from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
OAC rule 3745-17-11(B)(1)	(PE) emissions shall not exceed 0.551 lbs/hr.
OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8.0 lbs/hr, or 40.0 lbs/day, on any day when employing any photochemically reactive material (see A.2.b).

**2. Additional Terms and Conditions**

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE, OC (methylene chloride)\*, NO<sub>x</sub>, CO and SO<sub>2</sub> emissions from this air contaminant source since the uncontrolled potential to emit for OC, NO<sub>x</sub>, CO and SO<sub>2</sub> is less than ten tons per year.

\*The potential to emit for OCs (methylene chloride) is 4.36 tons per year.

- 2.b The hourly and daily OC emission limitations of 8 lbs and 40 lbs, respectively, are greater than the emissions unit's potentials to emit. Therefore, no additional monitoring, record keeping, and/or reporting requirements is necessary to ensure compliance with these emission limitations.

**B. Operational Restrictions**

1. The total emissions of each individual HAP, and the total emissions for all combined HAPs from this facility shall not exceed 9.95 tons per rolling, 12-month period, and 24.0 tons per, rolling 12-month period, respectively. To ensure these limits are met, Eaton Hydraulics is committing to meet the operational restrictions listed in Section B.2 of this permit.
2. The maximum annual adhesive materials usage for this facility shall not exceed 10,050 gallons based upon a rolling, 12 month summation of the monthly adhesive usage rates.
3. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the usage rates for adhesive materials usage and the *plant-wide* emission levels specified in the following Table:

Month(s)	Maximum cumulative Adhesive Material Usage (Gallons)	Maximum Allowable Cumulative Facility-wide Emission of Each Individual HAP (Tons)	Maximum Allowable Cumulative Facility-wide Emission of total Combined HAPS (Tons)
1	1,818	1.8	4
1 - 2	3,636	3.6	8
1 - 3	4,545	4.5	10
1 - 4	5,454	5.4	12
1 - 5	6,364	6.3	14
1 - 6	7,273	7.2	16
1 - 7	9,091	9.0	18
1 - 8	10,050	9.95	20
1 - 9	10,050	9.95	22
1 - 10	10,050	9.95	24
1 - 11	10,050	9.95	24
1 - 12	10,050	9.95	24

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations for each individual HAP and total combined HAPS shall be based on the rolling, 12-month summations of the monthly individual HAP and

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combined HAPs, respectively.

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual adhesive materials usage a rolling, 12-month summation of the monthly adhesive materials usage rates.

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

1. The permittee shall collect and record the following information for each month for the entire facility:
  - a. the company identification for each adhesive material employed;
  - b. the number of gallons of each adhesive material employed;
  - c. the number of gallons of all the adhesive materials employed;
  - d. the amount of each individual HAP in each adhesive material employed, in lbs/gallon, as applied;
  - e. the emission rate for each individual HAP from each adhesive material employed (b x d), in lbs;
  - f. the total emission rate for each individual HAP from all the adhesive materials employed (for each individual HAP, the summation of e for all adhesive materials), in lbs;
  - g. the total HAP emission rate for all HAPs combined from all the adhesive materials employed (summation of f for all HAPs for all adhesive materials), in lbs;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons;
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
  - j. for the first 12 months of operation following the issuance of this permit, the cumulative monthly adhesive materials usage rate, in gallons;
  - k. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month adhesive materials usage rate, in gallons; and

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1. documentation on whether or not any adhesive material employed is considered a photochemically reactive material.
2. The permit to install for this emissions unit P001 through P023 was evaluated based on the actual 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MeCl

TLV (mg/m<sup>3</sup>): 173.68

Maximum Hourly Emission Rate (lbs/hr): 7.93

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 118.8

MAGLC (ug/m<sup>3</sup>): 4,135

3. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - 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

Emissions Unit ID: P001

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.).
4. 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required,

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even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, 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 the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**D. Reporting Requirements**

1. The permittee shall submit annual reports to the Akron Regional Air Quality Management District that summarize the actual annual emissions of HAPs for the entire facility. The reports shall be submitted by April 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.95 and 24.0 tons, respectively (for the entire facility); and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations (for the entire facility).
  - b. All exceedances of the rolling, 12-month adhesive coatings usage restriction (for the entire facility),; and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels (for the entire facility).
3. The quarterly deviation (excursion) reports shall be submitted in accordance with the

Emissions Unit ID: P001

requirements specified in the General Terms and Conditions of this permit.

## E. Testing Requirements

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

- a. Emission Limitations:  
8.0 lbs OC / hr  
40.0 lbs OC/ day

Applicable Compliance Method:

The hourly allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of moisture cured urethane of 6.05 pounds/hr by the maximum OC content of 20%, by weight.

The daily allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of the moisture cured urethane of 145.2 pounds/day by the maximum OC content of 20%, by weight.

If required, compliance with the hourly allowable OC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- b. Emission Limitations:  
9.95 tons per rolling, 12-month period for each individual HAP (for the entire facility)  
24.0 ton per rolling, 12-month period for the combined HAPs (for the entire facility)

Applicable Compliance Method:

Compliance with the HAP emission limitations above shall be demonstrated through the record the keeping required in section C of this permit.

- c. Emission Limitation:

PE shall not exceed 0.551 lbs/hr

Applicable Compliance Method:

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If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation in accordance with the OAC rule 3745-17-03(B)(10).

d. Emission Limitations:

Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the visible PE limitation above in accordance with OAC rule 3745-17-03(B)(1)(a).

**F. Miscellaneous Requirements**

1. All the terms and conditions of this permit are federally enforceable, except Sections C.2, C3, and C4.

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

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

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

**Operations, Property, and/or Equipment - (P002) - Lapper 2, Application of reinforcing braid to hoses and plastic tubing using adhesives. Consisting of hose reels, adhesive applicators, braiders, capstan puller and reel coilers.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See sections A.2.a and A.2.b below.
OAC rule 3745-31-05(C)	See B.1.
OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8.0 lbs/hr, or 40.0 lbs/day, on any day when employing any photochemically reactive material (see A.2.b).

**2. Additional Terms and Conditions**

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE, OC (methylene chloride)\*, NO<sub>x</sub>, CO and SO<sub>2</sub> emissions from this air contaminant source since the uncontrolled potential to emit for OC, NO<sub>x</sub>, CO and SO<sub>2</sub> is less than ten tons per year.

\*The potential to emit for OCs (methylene chloride) is 4.36 tons per year.

- 2.b The hourly and daily OC emission limitations of 8 lbs and 40 lbs, respectively, are greater than the emissions unit's potentials to emit. Therefore, no additional monitoring, record keeping, and/or reporting requirements is necessary to ensure compliance with these emission limitations.

**B. Operational Restrictions**

1. The total emissions of each individual HAP, and the total emissions for all combined HAPs from this facility shall not exceed 9.95 tons per rolling, 12-month period, and 24.0 tons per, rolling 12-month period, respectively. To ensure these limits are met,

**Eaton Corp**

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Emissions Unit ID: P002

Eaton Hydraulics is committing to meet the operational restrictions listed in Section B.2 of this permit.

2. The maximum annual adhesive materials usage for this facility shall not exceed 10,050 gallons based upon a rolling, 12 month summation of the monthly adhesive usage rates.
3. To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage rates for MeCl containing adhesive and the plant-wide emission levels specified in the following Table:

Month(s)	Maximum cumulative Adhesive Material Usage (Gallons)	Maximum Allowable Cumulative Facility-wide Emission of Each Individual HAP (Tons)	Maximum Allowable Cumulative Facility-wide Emission of total Combined HAPS (Tons)
1	1,818	1.8	4
1 - 2	3,636	3.6	8
1 - 3	4,545	4.5	10
1 - 4	5,454	5.4	12
1 - 5	6,364	6.3	14
1 - 6	7,273	7.2	16
1 - 7	9,091	9.0	18
1 - 8	10,050	9.95	20
1 - 9	10,050	9.95	22
1 - 10	10,050	9.95	24
1 - 11	10,050	9.95	24
1 - 12	10,050	9.95	24

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations shall be based on rolling, 12-month summations of the monthly emission rates.

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual adhesive materials usage limitation shall be based on a rolling, 12-month summation of the monthly adhesive materials usage rates.

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

1. The permittee shall collect and record the following information for each month for the entire facility:
  - a. the company identification for each adhesive material employed;
  - b. the number of gallons of each adhesive material employed;
  - c. the number of gallons of all the adhesive materials employed;
  - d. the amount of each individual HAP in each adhesive material employed, in lbs/gallon, as applied;
  - e. the emission rate for each individual HAP from each adhesive material employed (b x d), in lbs;
  - f. the total emission rate for each individual HAP from all the adhesive materials employed (for each individual HAP, the summation of e for all adhesive materials), in lbs;
  - g. the total HAP emission rate for all HAPs combined from all the adhesive materials employed (summation of f for all HAPs for all adhesive materials), in lbs;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons;
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
  - j. for the first 12 months of operation following the issuance of this permit, the cumulative monthly adhesive materials usage rate, in gallons;
  - k. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month adhesive materials usage rate, in gallons; and
  - l. documentation on whether or not any adhesive material employed is considered a photochemically reactive material.
2. The permit to install for this emissions unit P001 through P023 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system,

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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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MeCl

TLV (mg/m<sup>3</sup>): 173.68

Maximum Hourly Emission Rate (lbs/hr): 7.93

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 118.8

MAGLC (ug/m<sup>3</sup>): 4,135

3. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - 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.).

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4. 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be

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required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, 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 the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**D. Reporting Requirements**

1. The permittee shall submit annual reports to the Akron Regional Air Quality Management District that summarize the actual annual emissions of HAPs for the entire facility. The reports shall be submitted by April 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.95 and 24.0 tons, respectively (for the entire facility); and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations (for the entire facility).
  - b. All exceedances of the rolling, 12-month adhesive coatings usage restriction (for the entire facility);, and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels (for the entire facility).
3. The quarterly deviation (excursion) reports shall be submitted in accordance with the

Emissions Unit ID: **P002**

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requirements specified in the General Terms and Conditions of this permit.

**E. Testing Requirements**

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

- a. Emission Limitations:

8.0 lbs OC / hr  
40.0 lbs OC/ day

Applicable Compliance Method:

The hourly allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of moisture cured urethane of 6.05 pounds/hr by the maximum OC content of 20%, by weight.

The daily allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of the moisture cured urethane of 8.1 pounds/day by the maximum OC content of 20%, by weight.

If required, compliance with the hourly allowable OC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- b. Emission Limitations:

9.95 tons per rolling, 12-month period for each individual HAP (for the entire facility)  
24.0 ton per rolling, 12-month period for the combined HAPs (for the entire facility)

Applicable Compliance Method:

Compliance with the HAP emission limitations above shall be demonstrated through the record the keeping required in section C of this permit.

**F. Miscellaneous Requirements**

1. All the terms and conditions of this permit are federally enforceable, except Sections C.2, C3, and C4.

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

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

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

**Operations, Property, and/or Equipment - (P003) - MR11 Machine 1, Application of reinforcing braid to hoses and plastic tubing using adhesives. Consisting of hose reels, adhesive applicators, braiders, capstan puller and reel coilers.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See sections A.2.a and A.2.b below.
OAC rule 3745-31-05(C)	See B.1.
OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8.0 lbs/hr, or 40.0 lbs/day, on any day when employing any photochemically reactive material (see A.2.b).

**2. Additional Terms and Conditions**

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE, OC (methylene chloride)\*, NO<sub>x</sub>, CO and SO<sub>2</sub> emissions from this air contaminant source since the uncontrolled potential to emit for OC, NO<sub>x</sub>, CO and SO<sub>2</sub> is less than ten tons per year.

\*The potential to emit for OCs (methylene chloride) is 4.36 tons per year.

- 2.b The hourly and daily OC emission limitations of 8 lbs and 40 lbs, respectively, are greater than the emissions unit's potentials to emit. Therefore, no additional monitoring, record keeping, and/or reporting requirements is necessary to ensure compliance with these emission limitations.

**B. Operational Restrictions**

1. The total emissions of each individual HAP, and the total emissions for all combined HAPs from this facility shall not exceed 9.95 tons per rolling, 12-month period, and 24.0 tons per, rolling 12-month period, respectively. To ensure these limits are met,

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Eaton Hydraulics is committing to meet the operational restrictions listed in Section B.2 of this permit.

2. The maximum annual adhesive materials usage for this facility shall not exceed 10,050 gallons based upon a rolling, 12 month summation of the monthly adhesive usage rates.
3. To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage rates for MeCl containing adhesive and the plant-wide emission levels specified in the following Table:

<b>Month(s)</b>	<b>Maximum cumulative Adhesive Material Usage (Gallons)</b>	<b>Maximum Allowable Cumulative Facility-wide Emission of Each Individual HAP (Tons)</b>	<b>Maximum Allowable Cumulative Facility-wide Emission of total Combined HAPS (Tons)</b>
1	1,818	1.8	4
1 - 2	3,636	3.6	8
1 - 3	4,545	4.5	10
1 - 4	5,454	5.4	12
1 - 5	6,364	6.3	14
1 - 6	7,273	7.2	16
1 - 7	9,091	9.0	18
1 - 8	10,050	9.95	20
1 - 9	10,050	9.95	22
1 - 10	10,050	9.95	24
1 - 11	10,050	9.95	24
1 - 12	10,050	9.95	24

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations shall be based on rolling, 12-month summations of the monthly emission rates.

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual adhesive materials usage limitation shall be based on a rolling, 12-month summation of the monthly adhesive materials usage rates.

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

1. The permittee shall collect and record the following information for each month for the entire facility:
  - a. the company identification for each adhesive material employed;
  - b. the number of gallons of each adhesive material employed;
  - c. the number of gallons of all the adhesive materials employed;
  - d. the amount of each individual HAP in each adhesive material employed, in lbs/gallon, as applied;
  - e. the emission rate for each individual HAP from each adhesive material employed (b x d), in lbs;
  - f. the total emission rate for each individual HAP from all the adhesive materials employed (for each individual HAP, the summation of e for all adhesive materials), in lbs;
  - g. the total HAP emission rate for all HAPs combined from all the adhesive materials employed (summation of f for all HAPs for all adhesive materials), in lbs;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons;
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
  - j. for the first 12 months of operation following the issuance of this permit, the cumulative monthly adhesive materials usage rate, in gallons;
  - k. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month adhesive materials usage rate, in gallons; and
  - l. documentation on whether or not any adhesive material employed is considered a photochemically reactive material.
2. The permit to install for this emissions unit P001 through P023 was evaluated based on the actual 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

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"Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MeCl

TLV (mg/m<sup>3</sup>): 173.68

Maximum Hourly Emission Rate (lbs/hr): 7.93

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 118.8

MAGLC (ug/m<sup>3</sup>): 4,135

3. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - 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.).

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4. 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be

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required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, 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 the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**D. Reporting Requirements**

1. The permittee shall submit annual reports to the Akron Regional Air Quality Management District that summarize the actual annual emissions of HAPs for the entire facility. The reports shall be submitted by April 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.95 and 24.0 tons, respectively (for the entire facility); and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations (for the entire facility).
  - b. All exceedances of the rolling, 12-month adhesive coatings usage restriction (for the entire facility);,; and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels (for the entire facility).
3. The quarterly deviation (excursion) reports shall be submitted in accordance with the

Emissions Unit ID: **P003**

**Issued: To be entered upon final issuance**

requirements specified in the General Terms and Conditions of this permit.

**Issued: To be entered upon final issuance**

**E. Testing Requirements**

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

- a. Emission Limitations:  
8.0 lbs OC / hr  
40.0 lbs OC/ day

Applicable Compliance Method:

The hourly allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of moisture cured urethane of 0.33 pound/hr by the maximum OC content of 20%, by weight.

The daily allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of the moisture cured urethane of 8.1 pounds/day by the maximum OC content of 20%, by weight.

If required, compliance with the hourly allowable OC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- b. Emission Limitations:

9.95 tons per rolling, 12-month period for each individual HAP (for the entire facility)

24.0 ton per rolling, 12-month period for the combined HAPs (for the entire facility)

Applicable Compliance Method:

Compliance with the HAP emission limitations above shall be demonstrated through the record the keeping required in section C of this permit.

**F. Miscellaneous Requirements**

1. All the terms and conditions of this permit are federally enforceable, except Sections C.2. C3, and C4.

**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.

**Operations, Property, and/or Equipment - (P004) - MR11 Machine 2, Application of reinforcing braid to hoses and plastic tubing using adhesives. Consisting of hose reels, adhesive applicators, braiders, capstan puller and reel coilers.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See sections A.2.a and A.2.b below.
OAC rule 3745-31-05(C)	See B.1.
OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8.0 lbs/hr, or 40.0 lbs/day, on any day when employing any photochemically reactive material (see A.2.b).

**2. Additional Terms and Conditions**

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE, OC (methylene chloride)\*, NO<sub>x</sub>, CO and SO<sub>2</sub> emissions from this air contaminant source since the uncontrolled potential to emit for OC, NO<sub>x</sub>, CO and SO<sub>2</sub> is less than ten tons per year.

\*The potential to emit for OCs (methylene chloride) is 4.36 tons per year.

- 2.b The hourly and daily OC emission limitations of 8 lbs and 40 lbs, respectively, are greater than the emissions unit's potentials to emit. Therefore, no additional monitoring, record keeping, and/or reporting requirements is necessary to ensure compliance with these emission limitations.

**B. Operational Restrictions**

1. The total emissions of each individual HAP, and the total emissions for all combined HAPs from this facility shall not exceed 9.95 tons per rolling, 12-month period, and 24.0 tons per, rolling 12-month period, respectively. To ensure these limits are met, Eaton Hydraulics is committing to meet the operational restrictions listed in Section B.2

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of this permit.

2. The maximum annual adhesive materials usage for this facility shall not exceed 10,050 gallons based upon a rolling, 12 month summation of the monthly adhesive usage rates.
3. To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage rates for MeCl containing adhesive and the plant-wide emission levels specified in the following Table:

<b>Month(s)</b>	<b>Maximum cumulative Adhesive Material Usage (Gallons)</b>	<b>Maximum Allowable Cumulative Facility-wide Emission of Each Individual HAP (Tons)</b>	<b>Maximum Allowable Cumulative Facility-wide Emission of total Combined HAPS (Tons)</b>
1	1,818	1.8	4
1 - 2	3,636	3.6	8
1 - 3	4,545	4.5	10
1 - 4	5,454	5.4	12
1 - 5	6,364	6.3	14
1 - 6	7,273	7.2	16
1 - 7	9,091	9.0	18
1 - 8	10,050	9.95	20
1 - 9	10,050	9.95	22
1 - 10	10,050	9.95	24
1 - 11	10,050	9.95	24
1 - 12	10,050	9.95	24

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations shall be based on rolling, 12-month summations of the monthly emission rates.

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual adhesive materials usage limitation shall be based on a rolling, 12-month summation of the monthly adhesive materials usage rates.

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

1. The permittee shall collect and record the following information for each month for the entire facility:
  - a. the company identification for each adhesive material employed;
  - b. the number of gallons of each adhesive material employed;
  - c. the number of gallons of all the adhesive materials employed;
  - d. the amount of each individual HAP in each adhesive material employed, in lbs/gallon, as applied;
  - e. the emission rate for each individual HAP from each adhesive material employed (b x d), in lbs;
  - f. the total emission rate for each individual HAP from all the adhesive materials employed (for each individual HAP, the summation of e for all adhesive materials), in lbs;
  - g. the total HAP emission rate for all HAPs combined from all the adhesive materials employed (summation of f for all HAPs for all adhesive materials), in lbs;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons;
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
  - j. for the first 12 months of operation following the issuance of this permit, the cumulative monthly adhesive materials usage rate, in gallons;
  - k. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month adhesive materials usage rate, in gallons; and
  - l. documentation on whether or not any adhesive material employed is considered a photochemically reactive material.
2. The permit to install for this emissions unit P001 through P023 was evaluated based on the actual 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

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"Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MeCl

TLV (mg/m<sup>3</sup>): 173.68

Maximum Hourly Emission Rate (lbs/hr): 7.93

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 118.8

MAGLC (ug/m<sup>3</sup>): 4,135

3. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - 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.).

Emissions Unit ID: **P004**

4. 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, 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 the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### **D. Reporting Requirements**

1. The permittee shall submit annual reports to the Akron Regional Air Quality Management District that summarize the actual annual emissions of HAPs for the entire facility. The reports shall be submitted by April 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.95 and 24.0 tons, respectively (for the entire facility); and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations (for the entire facility).
  - b. All exceedances of the rolling, 12-month adhesive coatings usage restriction (for the entire facility),; and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative

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coating usage levels (for the entire facility).

3. The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions of this permit.

**E. Testing Requirements**

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

- a. Emission Limitations:  
8.0 lbs OC / hr  
40.0 lbs OC/ day

Applicable Compliance Method:

The hourly allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of moisture cured urethane of 0.33 pound/hr by the maximum OC content of 20%, by weight.

The daily allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of the moisture cured urethane of 8.1 pounds/day by the maximum OC content of 20%, by weight.

If required, compliance with the hourly allowable OC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- b. Emission Limitations:

9.95 tons per rolling, 12-month period for each individual HAP (for the entire facility)  
24.0 ton per rolling, 12-month period for the combined HAPs (for the entire facility)

Applicable Compliance Method:

Compliance with the HAP emission limitations above shall be demonstrated through the record the keeping required in section C of this permit.

**Issued: To be entered upon final issuance**

**F. Miscellaneous Requirements**

1. All the terms and conditions of this permit are federally enforceable, except Sections C.2. C3, and C4.

Issued: To be entered upon final issuance

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

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

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

**Operations, Property, and/or Equipment - (P005) - MR11 Machine 3, &#65279;Application of reinforcing braid to hoses and plastic tubing using adhesives. Consisting of hose reels, adhesive applicators, braiders, capstan puller and reel coilers.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See sections A.2.a and A.2.b below.
OAC rule 3745-31-05(C)	See B.1.
OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8.0 lbs/hr, or 40.0 lbs/day, on any day when employing any photochemically reactive material (see A.2.b).

**2. Additional Terms and Conditions**

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE, OC (methylene chloride)\*, NO<sub>x</sub>, CO and SO<sub>2</sub> emissions from this air contaminant source since the uncontrolled potential to emit for OC, NO<sub>x</sub>, CO and SO<sub>2</sub> is less than ten tons per year.

\*The potential to emit for OCs (methylene chloride) is 4.36 tons per year.

- 2.b The hourly and daily OC emission limitations of 8 lbs and 40 lbs, respectively, are greater than the emissions unit's potentials to emit. Therefore, no additional monitoring, record keeping, and/or reporting requirements is necessary to ensure compliance with these emission limitations.

**B. Operational Restrictions**

1. The total emissions of each individual HAP, and the total emissions for all combined HAPs from this facility shall not exceed 9.95 tons per rolling, 12-month period, and 24.0 tons per, rolling 12-month period, respectively. To ensure these limits are met,

**Eaton Corp**

DTL Application: 16-02478

Facility ID: 1667020046

Emissions Unit ID: P005

Eaton Hydraulics is committing to meet the operational restrictions listed in Section B.2 of this permit.

2. The maximum annual adhesive materials usage for this facility shall not exceed 10,050 gallons based upon a rolling, 12 month summation of the monthly adhesive usage rates.
3. To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage rates for MeCl containing adhesive and the plant-wide emission levels specified in the following Table:

Month(s)	Maximum cumulative Adhesive Material Usage (Gallons)	Maximum Allowable Cumulative Facility-wide Emission of Each Individual HAP (Tons)	Maximum Allowable Cumulative Facility-wide Emission of total Combined HAPS (Tons)
1	1,818	1.8	4
1 - 2	3,636	3.6	8
1 - 3	4,545	4.5	10
1 - 4	5,454	5.4	12
1 - 5	6,364	6.3	14
1 - 6	7,273	7.2	16
1 - 7	9,091	9.0	18
1 - 8	10,050	9.95	20
1 - 9	10,050	9.95	22
1 - 10	10,050	9.95	24
1 - 11	10,050	9.95	24
1 - 12	10,050	9.95	24

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations shall be based on rolling, 12-month summations of the monthly emission rates.

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual adhesive materials usage limitation shall be based on a rolling, 12-month summation of the monthly adhesive materials usage rates.

**Issued: To be entered upon final issuance**

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

1. The permittee shall collect and record the following information for each month for the entire facility:
  - a. the company identification for each adhesive material employed;
  - b. the number of gallons of each adhesive material employed;
  - c. the number of gallons of all the adhesive materials employed;
  - d. the amount of each individual HAP in each adhesive material employed, in lbs/gallon, as applied;
  - e. the emission rate for each individual HAP from each adhesive material employed (b x d), in lbs;
  - f. the total emission rate for each individual HAP from all the adhesive materials employed (for each individual HAP, the summation of e for all adhesive materials), in lbs;
  - g. the total HAP emission rate for all HAPs combined from all the adhesive materials employed (summation of f for all HAPs for all adhesive materials), in lbs;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons;
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
  - j. for the first 12 months of operation following the issuance of this permit, the cumulative monthly adhesive materials usage rate, in gallons;
  - k. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month adhesive materials usage rate, in gallons; and
  - l. documentation on whether or not any adhesive material employed is considered a photochemically reactive material.
2. The permit to install for this emissions unit P001 through P023 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system,

Emissions Unit ID: P005

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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MeCl

TLV (mg/m<sup>3</sup>): 173.68

Maximum Hourly Emission Rate (lbs/hr): 7.93

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 118.8MAGLC (ug/m<sup>3</sup>): 4,135

3. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - 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.).

**Issued: To be entered upon final issuance**

4. 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, 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 the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**D. Reporting Requirements**

1. The permittee shall submit annual reports to the Akron Regional Air Quality Management District that summarize the actual annual emissions of HAPs for the entire facility. The reports shall be submitted by April 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.95 and 24.0 tons, respectively (for the entire facility); and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations (for the entire facility).
  - b. All exceedances of the rolling, 12-month adhesive coatings usage restriction (for the entire facility),; and for the first 12 calendar months of operation following the

Emissions Unit ID: P005

issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels (for the entire facility).

3. The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions of this permit.

## E. Testing Requirements

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

- a. Emission Limitations:

8.0 lbs OC / hr

40.0 lbs OC/ day

Applicable Compliance Method:

The hourly allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of moisture cured urethane of 0.33 pound/hr by the maximum OC content of 20%, by weight.

The daily allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of the moisture cured urethane of 8.1 pounds/day by the maximum OC content of 20%, by weight.

If required, compliance with the hourly allowable OC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- b. Emission Limitations:

9.95 tons per rolling, 12-month period for each individual HAP (for the entire facility)

24.0 ton per rolling, 12-month period for the combined HAPs (for the entire facility)

Applicable Compliance Method:

Compliance with the HAP emission limitations above shall be demonstrated through the record the keeping required in section C of this permit.

**Issued: To be entered upon final issuance**

**F. Miscellaneous Requirements**

1. All the terms and conditions of this permit are federally enforceable, except Sections C.2, C3, and C4.

Issued: To be entered upon final issuance

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

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

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

**Operations, Property, and/or Equipment - (P006) - MR11 Machine 4; Application of reinforcing braid to hoses and plastic tubing using adhesives. Consisting of hose reels, adhesive applicators, braiders, capstan puller and reel coilers.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See sections A.2.a and A.2.b below.
OAC rule 3745-31-05(C)	See B.1.
OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8.0 lbs/hr, or 40.0 lbs/day, on any day when employing any photochemically reactive material (see A.2.b).

**2. Additional Terms and Conditions**

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE, OC (methylene chloride)\*, NO<sub>x</sub>, CO and SO<sub>2</sub> emissions from this air contaminant source since the uncontrolled potential to emit for OC, NO<sub>x</sub>, CO and SO<sub>2</sub> is less than ten tons per year.

\*The potential to emit for OCs (methylene chloride) is 4.36 tons per year.

- 2.b The hourly and daily OC emission limitations of 8 lbs and 40 lbs, respectively, are greater than the emissions unit's potentials to emit. Therefore, no additional monitoring, record keeping, and/or reporting requirements is necessary to ensure compliance with these emission limitations.

**B. Operational Restrictions**

1. The total emissions of each individual HAP, and the total emissions for all combined HAPs from this facility shall not exceed 9.95 tons per rolling, 12-month period, and 24.0 tons per, rolling 12-month period, respectively. To ensure these limits are met,

**Eaton Corp**

DTL Application: 16-02478

Facility ID: 1667020046

Emissions Unit ID: P006

Eaton Hydraulics is committing to meet the operational restrictions listed in Section B.2 of this permit.

2. The maximum annual adhesive materials usage for this facility shall not exceed 10,050 gallons based upon a rolling, 12 month summation of the monthly adhesive usage rates.
3. To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage rates for MeCl containing adhesive and the plant-wide emission levels specified in the following Table:

Month(s)	Maximum cumulative Adhesive Material Usage (Gallons)	Maximum Allowable Cumulative Facility-wide Emission of Each Individual HAP (Tons)	Maximum Allowable Cumulative Facility-wide Emission of total Combined HAPS (Tons)
1	1,818	1.8	4
1 - 2	3,636	3.6	8
1 - 3	4,545	4.5	10
1 - 4	5,454	5.4	12
1 - 5	6,364	6.3	14
1 - 6	7,273	7.2	16
1 - 7	9,091	9.0	18
1 - 8	10,050	9.95	20
1 - 9	10,050	9.95	22
1 - 10	10,050	9.95	24
1 - 11	10,050	9.95	24
1 - 12	10,050	9.95	24

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations shall be based on rolling, 12-month summations of the monthly emission rates.

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual adhesive materials usage limitation shall be based on a rolling, 12-month summation of the monthly adhesive materials usage rates.

**Issued: To be entered upon final issuance**

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

1. The permittee shall collect and record the following information for each month for the entire facility:
  - a. the company identification for each adhesive material employed;
  - b. the number of gallons of each adhesive material employed;
  - c. the number of gallons of all the adhesive materials employed;
  - d. the amount of each individual HAP in each adhesive material employed, in lbs/gallon, as applied;
  - e. the emission rate for each individual HAP from each adhesive material employed (b x d), in lbs;
  - f. the total emission rate for each individual HAP from all the adhesive materials employed (for each individual HAP, the summation of e for all adhesive materials), in lbs;
  - g. the total HAP emission rate for all HAPs combined from all the adhesive materials employed (summation of f for all HAPs for all adhesive materials), in lbs;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons;
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
  - j. for the first 12 months of operation following the issuance of this permit, the cumulative monthly adhesive materials usage rate, in gallons;
  - k. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month adhesive materials usage rate, in gallons; and
  - l. documentation on whether or not any adhesive material employed is considered a photochemically reactive material.
2. The permit to install for this emissions unit P001 through P023 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system,

Emissions Unit ID: P006

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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MeCl

TLV (mg/m<sup>3</sup>): 173.68

Maximum Hourly Emission Rate (lbs/hr): 7.93

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 118.8MAGLC (ug/m<sup>3</sup>): 4,135

3. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - 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.).

**Issued: To be entered upon final issuance**

4. 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, 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 the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**D. Reporting Requirements**

1. The permittee shall submit annual reports to the Akron Regional Air Quality Management District that summarize the actual annual emissions of HAPs for the entire facility. The reports shall be submitted by April 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.95 and 24.0 tons, respectively (for the entire facility); and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations (for the entire facility).
  - b. All exceedances of the rolling, 12-month adhesive coatings usage restriction (for the entire facility),; and for the first 12 calendar months of operation following the

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issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels (for the entire facility).

3. The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions of this permit.

## E. Testing Requirements

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

- a. Emission Limitations:

8.0 lbs OC / hr

40.0 lbs OC/ day

Applicable Compliance Method:

The hourly allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of moisture cured urethane of 0.33 pound/hr by the maximum OC content of 20%, by weight.

The daily allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of the moisture cured urethane of 8.1 pounds/day by the maximum OC content of 20%, by weight.

If required, compliance with the hourly allowable OC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- b. Emission Limitations:

9.95 tons per rolling, 12-month period for each individual HAP (for the entire facility)

24.0 ton per rolling, 12-month period for the combined HAPs (for the entire facility)

Applicable Compliance Method:

Compliance with the HAP emission limitations above shall be demonstrated through the record the keeping required in section C of this permit.

**Issued: To be entered upon final issuance**

**F. Miscellaneous Requirements**

1. All the terms and conditions of this permit are federally enforceable, except Sections C.2. C3, and C4.

Issued: To be entered upon final issuance

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

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

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

**Operations, Property, and/or Equipment - (P007) - MR11 Machine 5; Application of reinforcing braid to hoses and plastic tubing using adhesives. Consisting of hose reels, adhesive applicators, braiders, capstan puller and reel coilers.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See sections A.2.a and A.2.b below.
OAC rule 3745-31-05(C)	See B.1.
OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8.0 lbs/hr, or 40.0 lbs/day, on any day when employing any photochemically reactive material (see A.2.b).

**2. Additional Terms and Conditions**

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE, OC (methylene chloride)\*, NO<sub>x</sub>, CO and SO<sub>2</sub> emissions from this air contaminant source since the uncontrolled potential to emit for OC, NO<sub>x</sub>, CO and SO<sub>2</sub> is less than ten tons per year.

\*The potential to emit for OCs (methylene chloride) is 4.36 tons per year.

- 2.b The hourly and daily OC emission limitations of 8 lbs and 40 lbs, respectively, are greater than the emissions unit's potentials to emit. Therefore, no additional monitoring, record keeping, and/or reporting requirements is necessary to ensure compliance with these emission limitations.

**B. Operational Restrictions**

1. The total emissions of each individual HAP, and the total emissions for all combined HAPs from this facility shall not exceed 9.95 tons per rolling, 12-month period, and 24.0 tons per, rolling 12-month period, respectively. To ensure these limits are met,

**Eaton Corp**

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Emissions Unit ID: P007

Eaton Hydraulics is committing to meet the operational restrictions listed in Section B.2 of this permit.

2. The maximum annual adhesive materials usage for this facility shall not exceed 10,050 gallons based upon a rolling, 12 month summation of the monthly adhesive usage rates.
3. To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage rates for MeCl containing adhesive and the plant-wide emission levels specified in the following Table:

Month(s)	Maximum cumulative Adhesive Material Usage (Gallons)	Maximum Allowable Cumulative Facility-wide Emission of Each Individual HAP (Tons)	Maximum Allowable Cumulative Facility-wide Emission of total Combined HAPS (Tons)
1	1,818	1.8	4
1 - 2	3,636	3.6	8
1 - 3	4,545	4.5	10
1 - 4	5,454	5.4	12
1 - 5	6,364	6.3	14
1 - 6	7,273	7.2	16
1 - 7	9,091	9.0	18
1 - 8	10,050	9.95	20
1 - 9	10,050	9.95	22
1 - 10	10,050	9.95	24
1 - 11	10,050	9.95	24
1 - 12	10,050	9.95	24

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations shall be based on rolling, 12-month summations of the monthly emission rates.

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual adhesive materials usage limitation shall be based on a rolling, 12-month summation of the monthly adhesive materials usage rates.

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

1. The permittee shall collect and record the following information for each month for the entire facility:
  - a. the company identification for each adhesive material employed;
  - b. the number of gallons of each adhesive material employed;
  - c. the number of gallons of all the adhesive materials employed;
  - d. the amount of each individual HAP in each adhesive material employed, in lbs/gallon, as applied;
  - e. the emission rate for each individual HAP from each adhesive material employed (b x d), in lbs;
  - f. the total emission rate for each individual HAP from all the adhesive materials employed (for each individual HAP, the summation of e for all adhesive materials), in lbs;
  - g. the total HAP emission rate for all HAPs combined from all the adhesive materials employed (summation of f for all HAPs for all adhesive materials), in lbs;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons;
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
  - j. for the first 12 months of operation following the issuance of this permit, the cumulative monthly adhesive materials usage rate, in gallons;
  - k. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month adhesive materials usage rate, in gallons; and
  - l. documentation on whether or not any adhesive material employed is considered a photochemically reactive material.
2. The permit to install for this emissions unit P001 through P023 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system,

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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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MeCl

TLV (mg/m<sup>3</sup>): 173.68

Maximum Hourly Emission Rate (lbs/hr): 7.93

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 118.8

MAGLC (ug/m<sup>3</sup>): 4,135

3. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - 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.).

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4. 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, 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 the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### **D. Reporting Requirements**

1. The permittee shall submit annual reports to the Akron Regional Air Quality Management District that summarize the actual annual emissions of HAPs for the entire facility. The reports shall be submitted by April 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.95 and 24.0 tons, respectively (for the entire facility); and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations (for the entire facility).
  - b. All exceedances of the rolling, 12-month adhesive coatings usage restriction (for the entire facility);, and for the first 12 calendar months of operation following the

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issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels (for the entire facility).

3. The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions of this permit.

**E. Testing Requirements**

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

- a. Emission Limitations:  
8.0 lbs OC / hr  
40.0 lbs OC/ day

Applicable Compliance Method:

The hourly allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of moisture cured urethane of 0.33 pound/hr by the maximum OC content of 20%, by weight.

The daily allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of the moisture cured urethane of 8.1 pounds/day by the maximum OC content of 20%, by weight.

If required, compliance with the hourly allowable OC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- b. Emission Limitations:

9.95 tons per rolling, 12-month period for each individual HAP (for the entire facility)  
24.0 ton per rolling, 12-month period for the combined HAPs (for the entire facility)

Applicable Compliance Method:

Compliance with the HAP emission limitations above shall be demonstrated through the record the keeping required in section C of this permit.

**Eaton Corp**

**DTL Application: 16-02478**

**Facility ID: 1667020046**

**Emissions Unit ID: P007**

**F. Miscellaneous Requirements**

1. All the terms and conditions of this permit are federally enforceable, except Sections C.2, C3, and C4.

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

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

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

**Operations, Property, and/or Equipment - (P008) - MR11 Machine 6; Application of reinforcing braid to hoses and plastic tubing using adhesives. Consisting of hose reels, adhesive applicators, braiders, capstan puller and reel coilers.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See sections A.2.a and A.2.b below.
OAC rule 3745-31-05(C)	See B.1.
OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8.0 lbs/hr, or 40.0 lbs/day, on any day when employing any photochemically reactive material (see A.2.b).

**2. Additional Terms and Conditions**

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE, OC (methylene chloride)\*, NO<sub>x</sub>, CO and SO<sub>2</sub> emissions from this air contaminant source since the uncontrolled potential to emit for OC, NO<sub>x</sub>, CO and SO<sub>2</sub> is less than ten tons per year.

\*The potential to emit for OCs (methylene chloride) is 4.36 tons per year.

- 2.b The hourly and daily OC emission limitations of 8 lbs and 40 lbs, respectively, are greater than the emissions unit's potentials to emit. Therefore, no additional monitoring, record keeping, and/or reporting requirements is necessary to ensure compliance with these emission limitations.

**B. Operational Restrictions**

1. The total emissions of each individual HAP, and the total emissions for all combined HAPs from this facility shall not exceed 9.95 tons per rolling, 12-month period, and 24.0 tons per, rolling 12-month period, respectively. To ensure these limits are met,

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Eaton Hydraulics is committing to meet the operational restrictions listed in Section B.2 of this permit.

2. The maximum annual adhesive materials usage for this facility shall not exceed 10,050 gallons based upon a rolling, 12 month summation of the monthly adhesive usage rates.
3. To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage rates for MeCl containing adhesive and the plant-wide emission levels specified in the following Table:

<b>Month(s)</b>	<b>Maximum cumulative Adhesive Material Usage (Gallons)</b>	<b>Maximum Allowable Cumulative Facility-wide Emission of Each Individual HAP (Tons)</b>	<b>Maximum Allowable Cumulative Facility-wide Emission of total Combined HAPS (Tons)</b>
1	1,818	1.8	4
1 - 2	3,636	3.6	8
1 - 3	4,545	4.5	10
1 - 4	5,454	5.4	12
1 - 5	6,364	6.3	14
1 - 6	7,273	7.2	16
1 - 7	9,091	9.0	18
1 - 8	10,050	9.95	20
1 - 9	10,050	9.95	22
1 - 10	10,050	9.95	24
1 - 11	10,050	9.95	24
1 - 12	10,050	9.95	24

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations shall be based on rolling, 12-month summations of the monthly emission rates.

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual adhesive materials usage limitation shall be based on a rolling, 12-month summation of the monthly adhesive materials usage rates.

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

1. The permittee shall collect and record the following information for each month for the entire facility:
  - a. the company identification for each adhesive material employed;
  - b. the number of gallons of each adhesive material employed;
  - c. the number of gallons of all the adhesive materials employed;
  - d. the amount of each individual HAP in each adhesive material employed, in lbs/gallon, as applied;
  - e. the emission rate for each individual HAP from each adhesive material employed (b x d), in lbs;
  - f. the total emission rate for each individual HAP from all the adhesive materials employed (for each individual HAP, the summation of e for all adhesive materials), in lbs;
  - g. the total HAP emission rate for all HAPs combined from all the adhesive materials employed (summation of f for all HAPs for all adhesive materials), in lbs;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons;
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
  - j. for the first 12 months of operation following the issuance of this permit, the cumulative monthly adhesive materials usage rate, in gallons;
  - k. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month adhesive materials usage rate, in gallons; and
  - l. documentation on whether or not any adhesive material employed is considered a photochemically reactive material.
2. The permit to install for this emissions unit P001 through P023 was evaluated based on the actual 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

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"Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MeCl

TLV (mg/m<sup>3</sup>): 173.68

Maximum Hourly Emission Rate (lbs/hr): 7.93

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 118.8

MAGLC (ug/m<sup>3</sup>): 4,135

3. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - 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.).

Emissions Unit ID: P008

4. 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, 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 the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### D. Reporting Requirements

1. The permittee shall submit annual reports to the Akron Regional Air Quality Management District that summarize the actual annual emissions of HAPs for the entire facility. The reports shall be submitted by April 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.95 and 24.0 tons, respectively (for the entire facility); and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations (for the entire facility).
  - b. All exceedances of the rolling, 12-month adhesive coatings usage restriction (for the entire facility),; and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative

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coating usage levels (for the entire facility).

3. The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions of this permit.

**E. Testing Requirements**

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

- a. Emission Limitations:  
8.0 lbs OC / hr  
40.0 lbs OC/ day

Applicable Compliance Method:

The hourly allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of moisture cured urethane of 0.33 pound/hr by the maximum OC content of 20%, by weight.

The daily allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of the moisture cured urethane of 8.1 pounds/day by the maximum OC content of 20%, by weight.

If required, compliance with the hourly allowable OC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- b. Emission Limitations:

9.95 tons per rolling, 12-month period for each individual HAP (for the entire facility)  
24.0 ton per rolling, 12-month period for the combined HAPs (for the entire facility)

Applicable Compliance Method:

Compliance with the HAP emission limitations above shall be demonstrated through the record the keeping required in section C of this permit.

**Eaton Corp**

**DTL Application: 16-02478**

**Facility ID: 1667020046**

**Emissions Unit ID: P008**

**F. Miscellaneous Requirements**

1. All the terms and conditions of this permit are federally enforceable, except Sections C.2, C3, and C4.

Issued: To be entered upon final issuance

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

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

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

**Operations, Property, and/or Equipment - (P009) - MR11 Machine 7; Application of reinforcing braid to hoses and plastic tubing using adhesives. Consisting of hose reels, adhesive applicators, braiders, capstan puller and reel coilers.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See sections A.2.a and A.2.b below.
OAC rule 3745-31-05(C)	See B.1.
OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8.0 lbs/hr, or 40.0 lbs/day, on any day when employing any photochemically reactive material (see A.2.b).

**2. Additional Terms and Conditions**

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE, OC (methylene chloride)\*, NO<sub>x</sub>, CO and SO<sub>2</sub> emissions from this air contaminant source since the uncontrolled potential to emit for OC, NO<sub>x</sub>, CO and SO<sub>2</sub> is less than ten tons per year.

\*The potential to emit for OCs (methylene chloride) is 4.36 tons per year.

- 2.b The hourly and daily OC emission limitations of 8 lbs and 40 lbs, respectively, are greater than the emissions unit's potentials to emit. Therefore, no additional monitoring, record keeping, and/or reporting requirements is necessary to ensure compliance with these emission limitations.

**B. Operational Restrictions**

1. The total emissions of each individual HAP, and the total emissions for all combined HAPs from this facility shall not exceed 9.95 tons per rolling, 12-month period, and 24.0 tons per, rolling 12-month period, respectively. To ensure these limits are met,

**Issued: To be entered upon final issuance**

Eaton Hydraulics is committing to meet the operational restrictions listed in Section B.2 of this permit.

2. The maximum annual adhesive materials usage for this facility shall not exceed 10,050 gallons based upon a rolling, 12 month summation of the monthly adhesive usage rates.
3. To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage rates for MeCl containing adhesive and the plant-wide emission levels specified in the following Table:

<b>Month(s)</b>	<b>Maximum cumulative Adhesive Material Usage (Gallons)</b>	<b>Maximum Allowable Cumulative Facility-wide Emission of Each Individual HAP (Tons)</b>	<b>Maximum Allowable Cumulative Facility-wide Emission of total Combined HAPS (Tons)</b>
1	1,818	1.8	4
1 - 2	3,636	3.6	8
1 - 3	4,545	4.5	10
1 - 4	5,454	5.4	12
1 - 5	6,364	6.3	14
1 - 6	7,273	7.2	16
1 - 7	9,091	9.0	18
1 - 8	10,050	9.95	20
1 - 9	10,050	9.95	22
1 - 10	10,050	9.95	24
1 - 11	10,050	9.95	24
1 - 12	10,050	9.95	24

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations shall be based on rolling, 12-month summations of the monthly emission rates.

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual adhesive materials usage limitation shall be based on a rolling, 12-month summation of the monthly adhesive materials usage rates.

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

1. The permittee shall collect and record the following information for each month for the entire facility:
  - a. the company identification for each adhesive material employed;
  - b. the number of gallons of each adhesive material employed;
  - c. the number of gallons of all the adhesive materials employed;
  - d. the amount of each individual HAP in each adhesive material employed, in lbs/gallon, as applied;
  - e. the emission rate for each individual HAP from each adhesive material employed (b x d), in lbs;
  - f. the total emission rate for each individual HAP from all the adhesive materials employed (for each individual HAP, the summation of e for all adhesive materials), in lbs;
  - g. the total HAP emission rate for all HAPs combined from all the adhesive materials employed (summation of f for all HAPs for all adhesive materials), in lbs;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons;
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
  - j. for the first 12 months of operation following the issuance of this permit, the cumulative monthly adhesive materials usage rate, in gallons;
  - k. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month adhesive materials usage rate, in gallons; and
  - l. documentation on whether or not any adhesive material employed is considered a photochemically reactive material.
2. The permit to install for this emissions unit P001 through P023 was evaluated based on the actual 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

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"Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MeCl

TLV (mg/m<sup>3</sup>): 173.68

Maximum Hourly Emission Rate (lbs/hr): 7.93

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 118.8

MAGLC (ug/m<sup>3</sup>): 4,135

3. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - 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.).

Emissions Unit ID: P009

4. 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, 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 the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### D. Reporting Requirements

1. The permittee shall submit annual reports to the Akron Regional Air Quality Management District that summarize the actual annual emissions of HAPs for the entire facility. The reports shall be submitted by April 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.95 and 24.0 tons, respectively (for the entire facility); and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations (for the entire facility).
  - b. All exceedances of the rolling, 12-month adhesive coatings usage restriction (for the entire facility),; and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative

**Issued: To be entered upon final issuance**

coating usage levels (for the entire facility).

3. The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions of this permit.

**E. Testing Requirements**

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

- a. Emission Limitations:  
8.0 lbs OC / hr  
40.0 lbs OC/ day

Applicable Compliance Method:

The hourly allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of moisture cured urethane of 0.33 pound/hr by the maximum OC content of 20%, by weight.

The daily allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of the moisture cured urethane of 8.1 pounds/day by the maximum OC content of 20%, by weight.

If required, compliance with the hourly allowable OC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- b. Emission Limitations:

9.95 tons per rolling, 12-month period for each individual HAP (for the entire facility)  
24.0 ton per rolling, 12-month period for the combined HAPs (for the entire facility)

Applicable Compliance Method:

Compliance with the HAP emission limitations above shall be demonstrated through the record the keeping required in section C of this permit.

**Issued: To be entered upon final issuance**

**F. Miscellaneous Requirements**

1. All the terms and conditions of this permit are federally enforceable, except Sections C.2. C3, and C4.

Issued: To be entered upon final issuance

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

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

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

**Operations, Property, and/or Equipment - (P010) - MR11 Machine 8; Application of reinforcing braid to hoses and plastic tubing using adhesives. Consisting of hose reels, adhesive applicators, braiders, capstan puller and reel coilers.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See sections A.2.a and A.2.b below.
OAC rule 3745-31-05(C)	See B.1.
OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8.0 lbs/hr, or 40.0 lbs/day, on any day when employing any photochemically reactive material (see A.2.b).

**2. Additional Terms and Conditions**

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE, OC (methylene chloride)\*, NO<sub>x</sub>, CO and SO<sub>2</sub> emissions from this air contaminant source since the uncontrolled potential to emit for OC, NO<sub>x</sub>, CO and SO<sub>2</sub> is less than ten tons per year.

\*The potential to emit for OCs (methylene chloride) is 4.36 tons per year.

- 2.b The hourly and daily OC emission limitations of 8 lbs and 40 lbs, respectively, are greater than the emissions unit's potentials to emit. Therefore, no additional monitoring, record keeping, and/or reporting requirements is necessary to ensure compliance with these emission limitations.

**B. Operational Restrictions**

1. The total emissions of each individual HAP, and the total emissions for all combined HAPs from this facility shall not exceed 9.95 tons per rolling, 12-month period, and 24.0 tons per, rolling 12-month period, respectively. To ensure these limits are met,

**Eaton Corp**

DTL Application: 16-02478

Facility ID: 1667020046

Emissions Unit ID: P010

Eaton Hydraulics is committing to meet the operational restrictions listed in Section B.2 of this permit.

2. The maximum annual adhesive materials usage for this facility shall not exceed 10,050 gallons based upon a rolling, 12 month summation of the monthly adhesive usage rates.
3. To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage rates for MeCl containing adhesive and the plant-wide emission levels specified in the following Table:

Month(s)	Maximum cumulative Adhesive Material Usage (Gallons)	Maximum Allowable Cumulative Facility-wide Emission of Each Individual HAP (Tons)	Maximum Allowable Cumulative Facility-wide Emission of total Combined HAPS (Tons)
1	1,818	1.8	4
1 - 2	3,636	3.6	8
1 - 3	4,545	4.5	10
1 - 4	5,454	5.4	12
1 - 5	6,364	6.3	14
1 - 6	7,273	7.2	16
1 - 7	9,091	9.0	18
1 - 8	10,050	9.95	20
1 - 9	10,050	9.95	22
1 - 10	10,050	9.95	24
1 - 11	10,050	9.95	24
1 - 12	10,050	9.95	24

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations shall be based on rolling, 12-month summations of the monthly emission rates.

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual adhesive materials usage limitation shall be based on a rolling, 12-month summation of the monthly adhesive materials usage rates.

**Issued: To be entered upon final issuance**

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

1. The permittee shall collect and record the following information for each month for the entire facility:
  - a. the company identification for each adhesive material employed;
  - b. the number of gallons of each adhesive material employed;
  - c. the number of gallons of all the adhesive materials employed;
  - d. the amount of each individual HAP in each adhesive material employed, in lbs/gallon, as applied;
  - e. the emission rate for each individual HAP from each adhesive material employed (b x d), in lbs;
  - f. the total emission rate for each individual HAP from all the adhesive materials employed (for each individual HAP, the summation of e for all adhesive materials), in lbs;
  - g. the total HAP emission rate for all HAPs combined from all the adhesive materials employed (summation of f for all HAPs for all adhesive materials), in lbs;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons;
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
  - j. for the first 12 months of operation following the issuance of this permit, the cumulative monthly adhesive materials usage rate, in gallons;
  - k. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month adhesive materials usage rate, in gallons; and
  - l. documentation on whether or not any adhesive material employed is considered a photochemically reactive material.
2. The permit to install for this emissions unit P001 through P023 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system,

Emissions Unit ID: **P010**

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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MeCl

TLV (mg/m<sup>3</sup>): 173.68

Maximum Hourly Emission Rate (lbs/hr): 7.93

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 118.8MAGLC (ug/m<sup>3</sup>): 4,135

3. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - 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.).

**Issued: To be entered upon final issuance**

4. 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, 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 the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**D. Reporting Requirements**

1. The permittee shall submit annual reports to the Akron Regional Air Quality Management District that summarize the actual annual emissions of HAPs for the entire facility. The reports shall be submitted by April 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.95 and 24.0 tons, respectively (for the entire facility); and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations (for the entire facility).
  - b. All exceedances of the rolling, 12-month adhesive coatings usage restriction (for the entire facility),; and for the first 12 calendar months of operation following the

Emissions Unit ID: P010

issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels (for the entire facility).

3. The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions of this permit.

## E. Testing Requirements

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

- a. Emission Limitations:

8.0 lbs OC / hr

40.0 lbs OC/ day

Applicable Compliance Method:

The hourly allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of moisture cured urethane of 0.33 pound/hr by the maximum OC content of 20%, by weight.

The daily allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of the moisture cured urethane of 8.1 pounds/day by the maximum OC content of 20%, by weight.

If required, compliance with the hourly allowable OC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- b. Emission Limitations:

9.95 tons per rolling, 12-month period for each individual HAP (for the entire facility)

24.0 ton per rolling, 12-month period for the combined HAPs (for the entire facility)

Applicable Compliance Method:

Compliance with the HAP emission limitations above shall be demonstrated through the record the keeping required in section C of this permit.

**Issued: To be entered upon final issuance**

**F. Miscellaneous Requirements**

1. All the terms and conditions of this permit are federally enforceable, except Sections C.2. C3, and C4.

Issued: To be entered upon final issuance

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

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

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

**Operations, Property, and/or Equipment - (P011) - MR11 Machine 9; Application of reinforcing braid to hoses and plastic tubing using adhesives. Consisting of hose reels, adhesive applicators, braiders, capstan puller and reel coilers.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See sections A.2.a and A.2.b below.
OAC rule 3745-31-05(C)	See B.1.
OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8.0 lbs/hr, or 40.0 lbs/day, on any day when employing any photochemically reactive material (see A.2.b).

**2. Additional Terms and Conditions**

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE, OC (methylene chloride)\*, NO<sub>x</sub>, CO and SO<sub>2</sub> emissions from this air contaminant source since the uncontrolled potential to emit for OC, NO<sub>x</sub>, CO and SO<sub>2</sub> is less than ten tons per year.

\*The potential to emit for OCs (methylene chloride) is 4.36 tons per year.

- 2.b The hourly and daily OC emission limitations of 8 lbs and 40 lbs, respectively, are greater than the emissions unit's potentials to emit. Therefore, no additional monitoring, record keeping, and/or reporting requirements is necessary to ensure compliance with these emission limitations.

**B. Operational Restrictions**

1. The total emissions of each individual HAP, and the total emissions for all combined HAPs from this facility shall not exceed 9.95 tons per rolling, 12-month period, and 24.0 tons per, rolling 12-month period, respectively. To ensure these limits are met,

**Eaton Corp**

DTL Application: 16-02478

Facility ID: 1667020046

Emissions Unit ID: P011

Eaton Hydraulics is committing to meet the operational restrictions listed in Section B.2 of this permit.

2. The maximum annual adhesive materials usage for this facility shall not exceed 10,050 gallons based upon a rolling, 12 month summation of the monthly adhesive usage rates.
3. To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage rates for MeCl containing adhesive and the plant-wide emission levels specified in the following Table:

Month(s)	Maximum cumulative Adhesive Material Usage (Gallons)	Maximum Allowable Cumulative Facility-wide Emission of Each Individual HAP (Tons)	Maximum Allowable Cumulative Facility-wide Emission of total Combined HAPS (Tons)
1	1,818	1.8	4
1 - 2	3,636	3.6	8
1 - 3	4,545	4.5	10
1 - 4	5,454	5.4	12
1 - 5	6,364	6.3	14
1 - 6	7,273	7.2	16
1 - 7	9,091	9.0	18
1 - 8	10,050	9.95	20
1 - 9	10,050	9.95	22
1 - 10	10,050	9.95	24
1 - 11	10,050	9.95	24
1 - 12	10,050	9.95	24

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations shall be based on rolling, 12-month summations of the monthly emission rates.

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual adhesive materials usage limitation shall be based on a rolling, 12-month summation of the monthly adhesive materials usage rates.

**Issued: To be entered upon final issuance**

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

1. The permittee shall collect and record the following information for each month for the entire facility:
  - a. the company identification for each adhesive material employed;
  - b. the number of gallons of each adhesive material employed;
  - c. the number of gallons of all the adhesive materials employed;
  - d. the amount of each individual HAP in each adhesive material employed, in lbs/gallon, as applied;
  - e. the emission rate for each individual HAP from each adhesive material employed (b x d), in lbs;
  - f. the total emission rate for each individual HAP from all the adhesive materials employed (for each individual HAP, the summation of e for all adhesive materials), in lbs;
  - g. the total HAP emission rate for all HAPs combined from all the adhesive materials employed (summation of f for all HAPs for all adhesive materials), in lbs;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons;
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
  - j. for the first 12 months of operation following the issuance of this permit, the cumulative monthly adhesive materials usage rate, in gallons;
  - k. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month adhesive materials usage rate, in gallons; and
  - l. documentation on whether or not any adhesive material employed is considered a photochemically reactive material.
2. The permit to install for this emissions unit P001 through P023 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system,

Emissions Unit ID: **P011**

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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MeCl

TLV (mg/m3): 173.68

Maximum Hourly Emission Rate (lbs/hr): 7.93

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 118.8

MAGLC (ug/m3): 4,135

3. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - 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.).

**Issued: To be entered upon final issuance**

4. 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, 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 the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**D. Reporting Requirements**

1. The permittee shall submit annual reports to the Akron Regional Air Quality Management District that summarize the actual annual emissions of HAPs for the entire facility. The reports shall be submitted by April 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.95 and 24.0 tons, respectively (for the entire facility); and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations (for the entire facility).
  - b. All exceedances of the rolling, 12-month adhesive coatings usage restriction (for the entire facility),; and for the first 12 calendar months of operation following the

Emissions Unit ID: P011

issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels (for the entire facility).

3. The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions of this permit.

## E. Testing Requirements

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

- a. Emission Limitations:

8.0 lbs OC / hr

40.0 lbs OC/ day

Applicable Compliance Method:

The hourly allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of moisture cured urethane of 0.33 pound/hr by the maximum OC content of 20%, by weight.

The daily allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of the moisture cured urethane of 8.1 pounds/day by the maximum OC content of 20%, by weight.

If required, compliance with the hourly allowable OC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- b. Emission Limitations:

9.95 tons per rolling, 12-month period for each individual HAP (for the entire facility)

24.0 ton per rolling, 12-month period for the combined HAPs (for the entire facility)

Applicable Compliance Method:

Compliance with the HAP emission limitations above shall be demonstrated through the record the keeping required in section C of this permit.

**Issued: To be entered upon final issuance**

**F. Miscellaneous Requirements**

1. All the terms and conditions of this permit are federally enforceable, except Sections C.2. C3, and C4.

Issued: To be entered upon final issuance

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

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

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

**Operations, Property, and/or Equipment - (P012) - MR11 Machine 10; Application of reinforcing braid to hoses and plastic tubing using adhesives. Consisting of hose reels, adhesive applicators, braiders, capstan puller and reel coilers.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See sections A.2.a and A.2.b below.
OAC rule 3745-31-05(C)	See B.1.
OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8.0 lbs/hr, or 40.0 lbs/day, on any day when employing any photochemically reactive material (see A.2.b).

**2. Additional Terms and Conditions**

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE, OC (methylene chloride)\*, NO<sub>x</sub>, CO and SO<sub>2</sub> emissions from this air contaminant source since the uncontrolled potential to emit for OC, NO<sub>x</sub>, CO and SO<sub>2</sub> is less than ten tons per year.

\*The potential to emit for OCs (methylene chloride) is 4.36 tons per year.

- 2.b The hourly and daily OC emission limitations of 8 lbs and 40 lbs, respectively, are greater than the emissions unit's potentials to emit. Therefore, no additional monitoring, record keeping, and/or reporting requirements is necessary to ensure compliance with these emission limitations.

**B. Operational Restrictions**

1. The total emissions of each individual HAP, and the total emissions for all combined HAPs from this facility shall not exceed 9.95 tons per rolling, 12-month period, and 24.0 tons per, rolling 12-month period, respectively. To ensure these limits are met,

**Eaton Corp**

DTL Application: 16-02478

Facility ID: 1667020046

Emissions Unit ID: P012

Eaton Hydraulics is committing to meet the operational restrictions listed in Section B.2 of this permit.

2. The maximum annual adhesive materials usage for this facility shall not exceed 10,050 gallons based upon a rolling, 12 month summation of the monthly adhesive usage rates.
3. To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage rates for MeCl containing adhesive and the plant-wide emission levels specified in the following Table:

Month(s)	Maximum cumulative Adhesive Material Usage (Gallons)	Maximum Allowable Cumulative Facility-wide Emission of Each Individual HAP (Tons)	Maximum Allowable Cumulative Facility-wide Emission of total Combined HAPS (Tons)
1	1,818	1.8	4
1 - 2	3,636	3.6	8
1 - 3	4,545	4.5	10
1 - 4	5,454	5.4	12
1 - 5	6,364	6.3	14
1 - 6	7,273	7.2	16
1 - 7	9,091	9.0	18
1 - 8	10,050	9.95	20
1 - 9	10,050	9.95	22
1 - 10	10,050	9.95	24
1 - 11	10,050	9.95	24
1 - 12	10,050	9.95	24

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations shall be based on rolling, 12-month summations of the monthly emission rates.

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual adhesive materials usage limitation shall be based on a rolling, 12-month summation of the monthly adhesive materials usage rates.

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

1. The permittee shall collect and record the following information for each month for the entire facility:
  - a. the company identification for each adhesive material employed;
  - b. the number of gallons of each adhesive material employed;
  - c. the number of gallons of all the adhesive materials employed;
  - d. the amount of each individual HAP in each adhesive material employed, in lbs/gallon, as applied;
  - e. the emission rate for each individual HAP from each adhesive material employed (b x d), in lbs;
  - f. the total emission rate for each individual HAP from all the adhesive materials employed (for each individual HAP, the summation of e for all adhesive materials), in lbs;
  - g. the total HAP emission rate for all HAPs combined from all the adhesive materials employed (summation of f for all HAPs for all adhesive materials), in lbs;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons;
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
  - j. for the first 12 months of operation following the issuance of this permit, the cumulative monthly adhesive materials usage rate, in gallons;
  - k. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month adhesive materials usage rate, in gallons; and
  - l. documentation on whether or not any adhesive material employed is considered a photochemically reactive material.
2. The permit to install for this emissions unit P001 through P023 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system,

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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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MeCl

TLV (mg/m<sup>3</sup>): 173.68

Maximum Hourly Emission Rate (lbs/hr): 7.93

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 118.8

MAGLC (ug/m<sup>3</sup>): 4,135

3. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - 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.).

Emissions Unit ID: P012

4. 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, 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 the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### **D. Reporting Requirements**

1. The permittee shall submit annual reports to the Akron Regional Air Quality Management District that summarize the actual annual emissions of HAPs for the entire facility. The reports shall be submitted by April 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.95 and 24.0 tons, respectively (for the entire facility); and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations (for the entire facility).
  - b. All exceedances of the rolling, 12-month adhesive coatings usage restriction (for the entire facility);, and for the first 12 calendar months of operation following the

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issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels (for the entire facility).

3. The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions of this permit.

**E. Testing Requirements**

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

- a. Emission Limitations:  
8.0 lbs OC / hr  
40.0 lbs OC/ day

Applicable Compliance Method:

The hourly allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of moisture cured urethane of 0.33 pound/hr by the maximum OC content of 20%, by weight.

The daily allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of the moisture cured urethane of 8.1 pounds/day by the maximum OC content of 20%, by weight.

If required, compliance with the hourly allowable OC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- b. Emission Limitations:

9.95 tons per rolling, 12-month period for each individual HAP (for the entire facility)  
24.0 ton per rolling, 12-month period for the combined HAPs (for the entire facility)

Applicable Compliance Method:

Compliance with the HAP emission limitations above shall be demonstrated through the record the keeping required in section C of this permit.

**Eaton Corp**

**DTL Application: 16-02478**

**Facility ID: 1667020046**

**Emissions Unit ID: P012**

**F. Miscellaneous Requirements**

1. All the terms and conditions of this permit are federally enforceable, except Sections C.2, C3, and C4.

Issued: To be entered upon final issuance

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

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

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

**Operations, Property, and/or Equipment - (P013) - MR11 Machine 11; Application of reinforcing braid to hoses and plastic tubing using adhesives. Consisting of hose reels, adhesive applicators, braiders, capstan puller and reel coilers.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See sections A.2.a and A.2.b below.
OAC rule 3745-31-05(C)	See B.1.
OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8.0 lbs/hr, or 40.0 lbs/day, on any day when employing any photochemically reactive material (see A.2.b).

**2. Additional Terms and Conditions**

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE, OC (methylene chloride)\*, NO<sub>x</sub>, CO and SO<sub>2</sub> emissions from this air contaminant source since the uncontrolled potential to emit for OC, NO<sub>x</sub>, CO and SO<sub>2</sub> is less than ten tons per year.

\*The potential to emit for OCs (methylene chloride) is 4.36 tons per year.

- 2.b The hourly and daily OC emission limitations of 8 lbs and 40 lbs, respectively, are greater than the emissions unit's potentials to emit. Therefore, no additional monitoring, record keeping, and/or reporting requirements is necessary to ensure compliance with these emission limitations.

**B. Operational Restrictions**

1. The total emissions of each individual HAP, and the total emissions for all combined HAPs from this facility shall not exceed 9.95 tons per rolling, 12-month period, and 24.0 tons per, rolling 12-month period, respectively. To ensure these limits are met,

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Eaton Hydraulics is committing to meet the operational restrictions listed in Section B.2 of this permit.

2. The maximum annual adhesive materials usage for this facility shall not exceed 10,050 gallons based upon a rolling, 12 month summation of the monthly adhesive usage rates.
3. To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage rates for MeCl containing adhesive and the plant-wide emission levels specified in the following Table:

<b>Month(s)</b>	<b>Maximum cumulative Adhesive Material Usage (Gallons)</b>	<b>Maximum Allowable Cumulative Facility-wide Emission of Each Individual HAP (Tons)</b>	<b>Maximum Allowable Cumulative Facility-wide Emission of total Combined HAPS (Tons)</b>
1	1,818	1.8	4
1 - 2	3,636	3.6	8
1 - 3	4,545	4.5	10
1 - 4	5,454	5.4	12
1 - 5	6,364	6.3	14
1 - 6	7,273	7.2	16
1 - 7	9,091	9.0	18
1 - 8	10,050	9.95	20
1 - 9	10,050	9.95	22
1 - 10	10,050	9.95	24
1 - 11	10,050	9.95	24
1 - 12	10,050	9.95	24

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations shall be based on rolling, 12-month summations of the monthly emission rates.

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual adhesive materials usage limitation shall be based on a rolling, 12-month summation of the monthly adhesive materials usage rates.

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

1. The permittee shall collect and record the following information for each month for the entire facility:
  - a. the company identification for each adhesive material employed;
  - b. the number of gallons of each adhesive material employed;
  - c. the number of gallons of all the adhesive materials employed;
  - d. the amount of each individual HAP in each adhesive material employed, in lbs/gallon, as applied;
  - e. the emission rate for each individual HAP from each adhesive material employed (b x d), in lbs;
  - f. the total emission rate for each individual HAP from all the adhesive materials employed (for each individual HAP, the summation of e for all adhesive materials), in lbs;
  - g. the total HAP emission rate for all HAPs combined from all the adhesive materials employed (summation of f for all HAPs for all adhesive materials), in lbs;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons;
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
  - j. for the first 12 months of operation following the issuance of this permit, the cumulative monthly adhesive materials usage rate, in gallons;
  - k. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month adhesive materials usage rate, in gallons; and
  - l. documentation on whether or not any adhesive material employed is considered a photochemically reactive material.
2. The permit to install for this emissions unit P001 through P023 was evaluated based on the actual 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

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"Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MeCl

TLV (mg/m<sup>3</sup>): 173.68

Maximum Hourly Emission Rate (lbs/hr): 7.93

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 118.8

MAGLC (ug/m<sup>3</sup>): 4,135

3. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - 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.).

Emissions Unit ID: P013

4. 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, 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 the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### D. Reporting Requirements

1. The permittee shall submit annual reports to the Akron Regional Air Quality Management District that summarize the actual annual emissions of HAPs for the entire facility. The reports shall be submitted by April 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.95 and 24.0 tons, respectively (for the entire facility); and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations (for the entire facility).
  - b. All exceedances of the rolling, 12-month adhesive coatings usage restriction (for the entire facility),; and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative

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coating usage levels (for the entire facility).

3. The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions of this permit.

**E. Testing Requirements**

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

- a. Emission Limitations:  
8.0 lbs OC / hr  
40.0 lbs OC/ day

Applicable Compliance Method:

The hourly allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of moisture cured urethane of 0.33 pound/hr by the maximum OC content of 20%, by weight.

The daily allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of the moisture cured urethane of 8.1 pounds/day by the maximum OC content of 20%, by weight.

If required, compliance with the hourly allowable OC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- b. Emission Limitations:

9.95 tons per rolling, 12-month period for each individual HAP (for the entire facility)  
24.0 ton per rolling, 12-month period for the combined HAPs (for the entire facility)

Applicable Compliance Method:

Compliance with the HAP emission limitations above shall be demonstrated through the record the keeping required in section C of this permit.

**Eaton Corp**

**DTL Application: 16-02478**

**Facility ID: 1667020046**

**Emissions Unit ID: P013**

**F. Miscellaneous Requirements**

1. All the terms and conditions of this permit are federally enforceable, except Sections C.2, C3, and C4.

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

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

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

**Operations, Property, and/or Equipment - (P014) - MR11 Machine 12; Application of reinforcing braid to hoses and plastic tubing using adhesives. Consisting of hose reels, adhesive applicators, braiders, capstan puller and reel coilers.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See sections A.2.a and A.2.b below.
OAC rule 3745-31-05(C)	See B.1.
OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8.0 lbs/hr, or 40.0 lbs/day, on any day when employing any photochemically reactive material (see A.2.b).

**2. Additional Terms and Conditions**

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE, OC (methylene chloride)\*, NO<sub>x</sub>, CO and SO<sub>2</sub> emissions from this air contaminant source since the uncontrolled potential to emit for OC, NO<sub>x</sub>, CO and SO<sub>2</sub> is less than ten tons per year.

\*The potential to emit for OCs (methylene chloride) is 4.36 tons per year.

- 2.b The hourly and daily OC emission limitations of 8 lbs and 40 lbs, respectively, are greater than the emissions unit's potentials to emit. Therefore, no additional monitoring, record keeping, and/or reporting requirements is necessary to ensure compliance with these emission limitations.

**B. Operational Restrictions**

1. The total emissions of each individual HAP, and the total emissions for all combined HAPs from this facility shall not exceed 9.95 tons per rolling, 12-month period, and 24.0 tons per, rolling 12-month period, respectively. To ensure these limits are met,

**Issued: To be entered upon final issuance**

Eaton Hydraulics is committing to meet the operational restrictions listed in Section B.2 of this permit.

2. The maximum annual adhesive materials usage for this facility shall not exceed 10,050 gallons based upon a rolling, 12 month summation of the monthly adhesive usage rates.
3. To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage rates for MeCl containing adhesive and the plant-wide emission levels specified in the following Table:

<b>Month(s)</b>	<b>Maximum cumulative Adhesive Material Usage (Gallons)</b>	<b>Maximum Allowable Cumulative Facility-wide Emission of Each Individual HAP (Tons)</b>	<b>Maximum Allowable Cumulative Facility-wide Emission of total Combined HAPS (Tons)</b>
1	1,818	1.8	4
1 - 2	3,636	3.6	8
1 - 3	4,545	4.5	10
1 - 4	5,454	5.4	12
1 - 5	6,364	6.3	14
1 - 6	7,273	7.2	16
1 - 7	9,091	9.0	18
1 - 8	10,050	9.95	20
1 - 9	10,050	9.95	22
1 - 10	10,050	9.95	24
1 - 11	10,050	9.95	24
1 - 12	10,050	9.95	24

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations shall be based on rolling, 12-month summations of the monthly emission rates.

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual adhesive materials usage limitation shall be based on a rolling, 12-month summation of the monthly adhesive materials usage rates.

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

1. The permittee shall collect and record the following information for each month for the entire facility:
  - a. the company identification for each adhesive material employed;
  - b. the number of gallons of each adhesive material employed;
  - c. the number of gallons of all the adhesive materials employed;
  - d. the amount of each individual HAP in each adhesive material employed, in lbs/gallon, as applied;
  - e. the emission rate for each individual HAP from each adhesive material employed (b x d), in lbs;
  - f. the total emission rate for each individual HAP from all the adhesive materials employed (for each individual HAP, the summation of e for all adhesive materials), in lbs;
  - g. the total HAP emission rate for all HAPs combined from all the adhesive materials employed (summation of f for all HAPs for all adhesive materials), in lbs;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons;
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
  - j. for the first 12 months of operation following the issuance of this permit, the cumulative monthly adhesive materials usage rate, in gallons;
  - k. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month adhesive materials usage rate, in gallons; and
  - l. documentation on whether or not any adhesive material employed is considered a photochemically reactive material.
2. The permit to install for this emissions unit P001 through P023 was evaluated based on the actual 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

**Issued: To be entered upon final issuance**

"Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MeCl

TLV (mg/m<sup>3</sup>): 173.68

Maximum Hourly Emission Rate (lbs/hr): 7.93

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 118.8

MAGLC (ug/m<sup>3</sup>): 4,135

3. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - 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.).

Emissions Unit ID: **P014**

4. 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, 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 the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### **D. Reporting Requirements**

1. The permittee shall submit annual reports to the Akron Regional Air Quality Management District that summarize the actual annual emissions of HAPs for the entire facility. The reports shall be submitted by April 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.95 and 24.0 tons, respectively (for the entire facility); and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations (for the entire facility).
  - b. All exceedances of the rolling, 12-month adhesive coatings usage restriction (for the entire facility),; and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative

**Issued: To be entered upon final issuance**

coating usage levels (for the entire facility).

3. The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions of this permit.

**E. Testing Requirements**

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

- a. Emission Limitations:  
8.0 lbs OC / hr  
40.0 lbs OC/ day

Applicable Compliance Method:

The hourly allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of moisture cured urethane of 0.33 pound/hr by the maximum OC content of 20%, by weight.

The daily allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of the moisture cured urethane of 8.1 pounds/day by the maximum OC content of 20%, by weight.

If required, compliance with the hourly allowable OC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- b. Emission Limitations:

9.95 tons per rolling, 12-month period for each individual HAP (for the entire facility)  
24.0 ton per rolling, 12-month period for the combined HAPs (for the entire facility)

Applicable Compliance Method:

Compliance with the HAP emission limitations above shall be demonstrated through the record the keeping required in section C of this permit.

**Issued: To be entered upon final issuance**

**F. Miscellaneous Requirements**

1. All the terms and conditions of this permit are federally enforceable, except Sections C.2. C3, and C4.

Issued: To be entered upon final issuance

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

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

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

**Operations, Property, and/or Equipment - (P015) - MR11 Machine13; Application of reinforcing braid to hoses and plastic tubing using adhesives. Consisting of hose reels, adhesive applicators, braiders, capstan puller and reel coilers.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See sections A.2.a and A.2.b below.
OAC rule 3745-31-05(C)	See B.1.
OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8.0 lbs/hr, or 40.0 lbs/day, on any day when employing any photochemically reactive material (see A.2.b).

**2. Additional Terms and Conditions**

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE, OC (methylene chloride)\*, NO<sub>x</sub>, CO and SO<sub>2</sub> emissions from this air contaminant source since the uncontrolled potential to emit for OC, NO<sub>x</sub>, CO and SO<sub>2</sub> is less than ten tons per year.

\*The potential to emit for OCs (methylene chloride) is 4.36 tons per year.

- 2.b The hourly and daily OC emission limitations of 8 lbs and 40 lbs, respectively, are greater than the emissions unit's potentials to emit. Therefore, no additional monitoring, record keeping, and/or reporting requirements is necessary to ensure compliance with these emission limitations.

**B. Operational Restrictions**

1. The total emissions of each individual HAP, and the total emissions for all combined HAPs from this facility shall not exceed 9.95 tons per rolling, 12-month period, and 24.0 tons per, rolling 12-month period, respectively. To ensure these limits are met,

**Eaton Corp**

DTL Application: 16-02478

Facility ID: 1667020046

Emissions Unit ID: P015

Eaton Hydraulics is committing to meet the operational restrictions listed in Section B.2 of this permit.

2. The maximum annual adhesive materials usage for this facility shall not exceed 10,050 gallons based upon a rolling, 12 month summation of the monthly adhesive usage rates.
3. To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage rates for MeCl containing adhesive and the plant-wide emission levels specified in the following Table:

Month(s)	Maximum cumulative Adhesive Material Usage (Gallons)	Maximum Allowable Cumulative Facility-wide Emission of Each Individual HAP (Tons)	Maximum Allowable Cumulative Facility-wide Emission of total Combined HAPS (Tons)
1	1,818	1.8	4
1 - 2	3,636	3.6	8
1 - 3	4,545	4.5	10
1 - 4	5,454	5.4	12
1 - 5	6,364	6.3	14
1 - 6	7,273	7.2	16
1 - 7	9,091	9.0	18
1 - 8	10,050	9.95	20
1 - 9	10,050	9.95	22
1 - 10	10,050	9.95	24
1 - 11	10,050	9.95	24
1 - 12	10,050	9.95	24

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations shall be based on rolling, 12-month summations of the monthly emission rates.

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual adhesive materials usage limitation shall be based on a rolling, 12-month summation of the monthly adhesive materials usage rates.

**Issued: To be entered upon final issuance**

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

1. The permittee shall collect and record the following information for each month for the entire facility:
  - a. the company identification for each adhesive material employed;
  - b. the number of gallons of each adhesive material employed;
  - c. the number of gallons of all the adhesive materials employed;
  - d. the amount of each individual HAP in each adhesive material employed, in lbs/gallon, as applied;
  - e. the emission rate for each individual HAP from each adhesive material employed (b x d), in lbs;
  - f. the total emission rate for each individual HAP from all the adhesive materials employed (for each individual HAP, the summation of e for all adhesive materials), in lbs;
  - g. the total HAP emission rate for all HAPs combined from all the adhesive materials employed (summation of f for all HAPs for all adhesive materials), in lbs;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons;
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
  - j. for the first 12 months of operation following the issuance of this permit, the cumulative monthly adhesive materials usage rate, in gallons;
  - k. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month adhesive materials usage rate, in gallons; and
  - l. documentation on whether or not any adhesive material employed is considered a photochemically reactive material.
2. The permit to install for this emissions unit P001 through P023 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system,

Emissions Unit ID: **P015**

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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MeCl

TLV (mg/m3): 173.68

Maximum Hourly Emission Rate (lbs/hr): 7.93

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 118.8

MAGLC (ug/m3): 4,135

3. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - 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.).

**Issued: To be entered upon final issuance**

4. 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, 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 the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**D. Reporting Requirements**

1. The permittee shall submit annual reports to the Akron Regional Air Quality Management District that summarize the actual annual emissions of HAPs for the entire facility. The reports shall be submitted by April 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.95 and 24.0 tons, respectively (for the entire facility); and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations (for the entire facility).
  - b. All exceedances of the rolling, 12-month adhesive coatings usage restriction (for the entire facility),; and for the first 12 calendar months of operation following the

Emissions Unit ID: P015

issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels (for the entire facility).

3. The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions of this permit.

## E. Testing Requirements

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

- a. Emission Limitations:

8.0 lbs OC / hr  
40.0 lbs OC/ day

Applicable Compliance Method:

The hourly allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of moisture cured urethane of 3.37 pound/hr by the maximum OC content of 20%, by weight.

The daily allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of the moisture cured urethane of 80.8 pounds/day by the maximum OC content of 20%, by weight.

If required, compliance with the hourly allowable OC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- b. Emission Limitations:

9.95 tons per rolling, 12-month period for each individual HAP (for the entire facility)  
24.0 ton per rolling, 12-month period for the combined HAPs (for the entire facility)

Applicable Compliance Method:

Compliance with the HAP emission limitations above shall be demonstrated through the record the keeping required in section C of this permit.

**Issued: To be entered upon final issuance**

**F. Miscellaneous Requirements**

1. All the terms and conditions of this permit are federally enforceable, except Sections C.2. C3, and C4.

Issued: To be entered upon final issuance

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

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

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

**Operations, Property, and/or Equipment - (P016) - Beam Server SO1; Application of reinforcing braid to hoses and plastic tubing using adhesives. Consisting of hose reels, adhesive applicators, braiders, capstan puller and reel coilers.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See sections A.2.a and A.2.b below.
OAC rule 3745-31-05(C)	See B.1.
OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8.0 lbs/hr, or 40.0 lbs/day, on any day when employing any photochemically reactive material (see A.2.b).

**2. Additional Terms and Conditions**

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE, OC (methylene chloride)\*, NO<sub>x</sub>, CO and SO<sub>2</sub> emissions from this air contaminant source since the uncontrolled potential to emit for OC, NO<sub>x</sub>, CO and SO<sub>2</sub> is less than ten tons per year.

\*The potential to emit for OCs (methylene chloride) is 4.36 tons per year.

- 2.b The hourly and daily OC emission limitations of 8 lbs and 40 lbs, respectively, are greater than the emissions unit's potentials to emit. Therefore, no additional monitoring, record keeping, and/or reporting requirements is necessary to ensure compliance with these emission limitations.

**B. Operational Restrictions**

1. The total emissions of each individual HAP, and the total emissions for all combined HAPs from this facility shall not exceed 9.95 tons per rolling, 12-month period, and 24.0 tons per, rolling 12-month period, respectively. To ensure these limits are met,

**Eaton Corp**

DTL Application: 16-02478

Facility ID: 1667020046

Emissions Unit ID: P016

Eaton Hydraulics is committing to meet the operational restrictions listed in Section B.2 of this permit.

2. The maximum annual adhesive materials usage for this facility shall not exceed 10,050 gallons based upon a rolling, 12 month summation of the monthly adhesive usage rates.
3. To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage rates for MeCl containing adhesive and the plant-wide emission levels specified in the following Table:

Month(s)	Maximum cumulative Adhesive Material Usage (Gallons)	Maximum Allowable Cumulative Facility-wide Emission of Each Individual HAP (Tons)	Maximum Allowable Cumulative Facility-wide Emission of total Combined HAPS (Tons)
1	1,818	1.8	4
1 - 2	3,636	3.6	8
1 - 3	4,545	4.5	10
1 - 4	5,454	5.4	12
1 - 5	6,364	6.3	14
1 - 6	7,273	7.2	16
1 - 7	9,091	9.0	18
1 - 8	10,050	9.95	20
1 - 9	10,050	9.95	22
1 - 10	10,050	9.95	24
1 - 11	10,050	9.95	24
1 - 12	10,050	9.95	24

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations shall be based on rolling, 12-month summations of the monthly emission rates.

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual adhesive materials usage limitation shall be based on a rolling, 12-month summation of the monthly adhesive materials usage rates.

**Issued: To be entered upon final issuance**

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

1. The permittee shall collect and record the following information for each month for the entire facility:
  - a. the company identification for each adhesive material employed;
  - b. the number of gallons of each adhesive material employed;
  - c. the number of gallons of all the adhesive materials employed;
  - d. the amount of each individual HAP in each adhesive material employed, in lbs/gallon, as applied;
  - e. the emission rate for each individual HAP from each adhesive material employed (b x d), in lbs;
  - f. the total emission rate for each individual HAP from all the adhesive materials employed (for each individual HAP, the summation of e for all adhesive materials), in lbs;
  - g. the total HAP emission rate for all HAPs combined from all the adhesive materials employed (summation of f for all HAPs for all adhesive materials), in lbs;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons;
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
  - j. for the first 12 months of operation following the issuance of this permit, the cumulative monthly adhesive materials usage rate, in gallons;
  - k. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month adhesive materials usage rate, in gallons; and
  - l. documentation on whether or not any adhesive material employed is considered a photochemically reactive material.
2. The permit to install for this emissions unit P001 through P023 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system,

Emissions Unit ID: **P016**

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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MeCl

TLV (mg/m<sup>3</sup>): 173.68

Maximum Hourly Emission Rate (lbs/hr): 7.93

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 118.8MAGLC (ug/m<sup>3</sup>): 4,135

3. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - 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.).

**Issued: To be entered upon final issuance**

4. 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, 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 the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**D. Reporting Requirements**

1. The permittee shall submit annual reports to the Akron Regional Air Quality Management District that summarize the actual annual emissions of HAPs for the entire facility. The reports shall be submitted by April 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.95 and 24.0 tons, respectively (for the entire facility); and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations (for the entire facility).
  - b. All exceedances of the rolling, 12-month adhesive coatings usage restriction (for the entire facility),; and for the first 12 calendar months of operation following the

Emissions Unit ID: P016

issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels (for the entire facility).

3. The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions of this permit.

## E. Testing Requirements

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

- a. Emission Limitations:

8.0 lbs OC / hr

40.0 lbs OC/ day

Applicable Compliance Method:

The hourly allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of moisture cured urethane of 10.2 pounds/hr by the maximum OC content of 20%, by weight.

The daily allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of the moisture cured urethane of 244.8 pounds/day by the maximum OC content of 20%, by weight.

If required, compliance with the hourly allowable OC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- b. Emission Limitations:

9.95 tons per rolling, 12-month period for each individual HAP (for the entire facility)

24.0 ton per rolling, 12-month period for the combined HAPs (for the entire facility)

Applicable Compliance Method:

Compliance with the HAP emission limitations above shall be demonstrated through the record the keeping required in section C of this permit.

**Issued: To be entered upon final issuance**

**F. Miscellaneous Requirements**

1. All the terms and conditions of this permit are federally enforceable, except Sections C.2. C3, and C4.

Issued: To be entered upon final issuance

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

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

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

**Operations, Property, and/or Equipment - (P017) - Beam Server SO<sub>2</sub>; Application of reinforcing braid to hoses and plastic tubing using adhesives. Consisting of hose reels, adhesive applicators, braiders, capstan puller and reel coilers.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See sections A.2.a and A.2.b below.
OAC rule 3745-31-05(C)	See B.1.
OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8.0 lbs/hr, or 40.0 lbs/day, on any day when employing any photochemically reactive material (see A.2.b).

**2. Additional Terms and Conditions**

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE, OC (methylene chloride)\*, NO<sub>x</sub>, CO and SO<sub>2</sub> emissions from this air contaminant source since the uncontrolled potential to emit for OC, NO<sub>x</sub>, CO and SO<sub>2</sub> is less than ten tons per year.

\*The potential to emit for OCs (methylene chloride) is 4.36 tons per year.

- 2.b The hourly and daily OC emission limitations of 8 lbs and 40 lbs, respectively, are greater than the emissions unit's potentials to emit. Therefore, no additional monitoring, record keeping, and/or reporting requirements is necessary to ensure compliance with these emission limitations.

**B. Operational Restrictions**

1. The total emissions of each individual HAP, and the total emissions for all combined HAPs from this facility shall not exceed 9.95 tons per rolling, 12-month period, and 24.0 tons per, rolling 12-month period, respectively. To ensure these limits are met,

**Eaton Corp**

DTL Application: 16-02478

Facility ID: 1667020046

Emissions Unit ID: P017

Eaton Hydraulics is committing to meet the operational restrictions listed in Section B.2 of this permit.

2. The maximum annual adhesive materials usage for this facility shall not exceed 10,050 gallons based upon a rolling, 12 month summation of the monthly adhesive usage rates.
3. To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage rates for MeCl containing adhesive and the plant-wide emission levels specified in the following Table:

Month(s)	Maximum cumulative Adhesive Material Usage (Gallons)	Maximum Allowable Cumulative Facility-wide Emission of Each Individual HAP (Tons)	Maximum Allowable Cumulative Facility-wide Emission of total Combined HAPS (Tons)
1	1,818	1.8	4
1 - 2	3,636	3.6	8
1 - 3	4,545	4.5	10
1 - 4	5,454	5.4	12
1 - 5	6,364	6.3	14
1 - 6	7,273	7.2	16
1 - 7	9,091	9.0	18
1 - 8	10,050	9.95	20
1 - 9	10,050	9.95	22
1 - 10	10,050	9.95	24
1 - 11	10,050	9.95	24
1 - 12	10,050	9.95	24

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations shall be based on rolling, 12-month summations of the monthly emission rates.

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual adhesive materials usage limitation shall be based on a rolling, 12-month summation of the monthly adhesive materials usage rates.

**Issued: To be entered upon final issuance**

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

1. The permittee shall collect and record the following information for each month for the entire facility:
  - a. the company identification for each adhesive material employed;
  - b. the number of gallons of each adhesive material employed;
  - c. the number of gallons of all the adhesive materials employed;
  - d. the amount of each individual HAP in each adhesive material employed, in lbs/gallon, as applied;
  - e. the emission rate for each individual HAP from each adhesive material employed (b x d), in lbs;
  - f. the total emission rate for each individual HAP from all the adhesive materials employed (for each individual HAP, the summation of e for all adhesive materials), in lbs;
  - g. the total HAP emission rate for all HAPs combined from all the adhesive materials employed (summation of f for all HAPs for all adhesive materials), in lbs;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons;
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
  - j. for the first 12 months of operation following the issuance of this permit, the cumulative monthly adhesive materials usage rate, in gallons;
  - k. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month adhesive materials usage rate, in gallons; and
  - l. documentation on whether or not any adhesive material employed is considered a photochemically reactive material.
2. The permit to install for this emissions unit P001 through P023 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system,

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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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MeCl

TLV (mg/m<sup>3</sup>): 173.68

Maximum Hourly Emission Rate (lbs/hr): 7.93

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 118.8

MAGLC (ug/m<sup>3</sup>): 4,135

3. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - 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.).

Emissions Unit ID: P017

4. 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, 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 the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### D. Reporting Requirements

1. The permittee shall submit annual reports to the Akron Regional Air Quality Management District that summarize the actual annual emissions of HAPs for the entire facility. The reports shall be submitted by April 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.95 and 24.0 tons, respectively (for the entire facility); and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations (for the entire facility).
  - b. All exceedances of the rolling, 12-month adhesive coatings usage restriction (for the entire facility);, and for the first 12 calendar months of operation following the

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issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels (for the entire facility).

3. The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions of this permit.

**E. Testing Requirements**

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

- a. Emission Limitations:  
8.0 lbs OC / hr  
40.0 lbs OC/ day

Applicable Compliance Method:

The hourly allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of moisture cured urethane of 10.2 pounds/hr by the maximum OC content of 20%, by weight.

The daily allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of the moisture cured urethane of 244.8 pounds/day by the maximum OC content of 20%, by weight.

If required, compliance with the hourly allowable OC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- b. Emission Limitations:

9.95 tons per rolling, 12-month period for each individual HAP (for the entire facility)  
24.0 ton per rolling, 12-month period for the combined HAPs (for the entire facility)

Applicable Compliance Method:

Compliance with the HAP emission limitations above shall be demonstrated through the record the keeping required in section C of this permit.

**Eaton Corp**

**DTL Application: 16-02478**

**Facility ID: 1667020046**

**Emissions Unit ID: P017**

**F. Miscellaneous Requirements**

1. All the terms and conditions of this permit are federally enforceable, except Sections C.2, C3, and C4.

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

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

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

**Operations, Property, and/or Equipment - (P018) - KARG Braider K1; Application of reinforcing braid to hoses and plastic tubing using adhesives. Consisting of hose reels, adhesive applicators, braiders, capstan puller and reel coilers.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See sections A.2.a and A.2.b below.
OAC rule 3745-31-05(C)	See B.1.
OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8.0 lbs/hr, or 40.0 lbs/day, on any day when employing any photochemically reactive material (see A.2.b).

**2. Additional Terms and Conditions**

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE, OC (methylene chloride)\*, NO<sub>x</sub>, CO and SO<sub>2</sub> emissions from this air contaminant source since the uncontrolled potential to emit for OC, NO<sub>x</sub>, CO and SO<sub>2</sub> is less than ten tons per year.

\*The potential to emit for OCs (methylene chloride) is 4.36 tons per year.

- 2.b The hourly and daily OC emission limitations of 8 lbs and 40 lbs, respectively, are greater than the emissions unit's potentials to emit. Therefore, no additional monitoring, record keeping, and/or reporting requirements is necessary to ensure compliance with these emission limitations.

**B. Operational Restrictions**

1. The total emissions of each individual HAP, and the total emissions for all combined HAPs from this facility shall not exceed 9.95 tons per rolling, 12-month period, and 24.0 tons per, rolling 12-month period, respectively. To ensure these limits are met,

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Eaton Hydraulics is committing to meet the operational restrictions listed in Section B.2 of this permit.

2. The maximum annual adhesive materials usage for this facility shall not exceed 10,050 gallons based upon a rolling, 12 month summation of the monthly adhesive usage rates.
3. To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage rates for MeCl containing adhesive and the plant-wide emission levels specified in the following Table:

<b>Month(s)</b>	<b>Maximum cumulative Adhesive Material Usage (Gallons)</b>	<b>Maximum Allowable Cumulative Facility-wide Emission of Each Individual HAP (Tons)</b>	<b>Maximum Allowable Cumulative Facility-wide Emission of total Combined HAPS (Tons)</b>
1	1,818	1.8	4
1 - 2	3,636	3.6	8
1 - 3	4,545	4.5	10
1 - 4	5,454	5.4	12
1 - 5	6,364	6.3	14
1 - 6	7,273	7.2	16
1 - 7	9,091	9.0	18
1 - 8	10,050	9.95	20
1 - 9	10,050	9.95	22
1 - 10	10,050	9.95	24
1 - 11	10,050	9.95	24
1 - 12	10,050	9.95	24

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations shall be based on rolling, 12-month summations of the monthly emission rates.

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual adhesive materials usage limitation shall be based on a rolling, 12-month summation of the monthly adhesive materials usage rates.

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

1. The permittee shall collect and record the following information for each month for the entire facility:
  - a. the company identification for each adhesive material employed;
  - b. the number of gallons of each adhesive material employed;
  - c. the number of gallons of all the adhesive materials employed;
  - d. the amount of each individual HAP in each adhesive material employed, in lbs/gallon, as applied;
  - e. the emission rate for each individual HAP from each adhesive material employed (b x d), in lbs;
  - f. the total emission rate for each individual HAP from all the adhesive materials employed (for each individual HAP, the summation of e for all adhesive materials), in lbs;
  - g. the total HAP emission rate for all HAPs combined from all the adhesive materials employed (summation of f for all HAPs for all adhesive materials), in lbs;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons;
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
  - j. for the first 12 months of operation following the issuance of this permit, the cumulative monthly adhesive materials usage rate, in gallons;
  - k. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month adhesive materials usage rate, in gallons; and
  - l. documentation on whether or not any adhesive material employed is considered a photochemically reactive material.
2. The permit to install for this emissions unit P001 through P023 was evaluated based on the actual 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

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"Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MeCl

TLV (mg/m<sup>3</sup>): 173.68

Maximum Hourly Emission Rate (lbs/hr): 7.93

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 118.8

MAGLC (ug/m<sup>3</sup>): 4,135

3. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - 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.).

Emissions Unit ID: P018

4. 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, 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 the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### D. Reporting Requirements

1. The permittee shall submit annual reports to the Akron Regional Air Quality Management District that summarize the actual annual emissions of HAPs for the entire facility. The reports shall be submitted by April 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.95 and 24.0 tons, respectively (for the entire facility); and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations (for the entire facility).
  - b. All exceedances of the rolling, 12-month adhesive coatings usage restriction (for the entire facility),; and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative

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coating usage levels (for the entire facility).

3. The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions of this permit.

**E. Testing Requirements**

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

- a. Emission Limitations:  
8.0 lbs OC / hr  
40.0 lbs OC/ day

Applicable Compliance Method:

The hourly allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of moisture cured urethane of 1.07 pounds/hr by the maximum OC content of 100%, by weight.

The daily allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of the moisture cured urethane of 26.1 pounds/day by the maximum OC content of 100%, by weight.

If required, compliance with the hourly allowable OC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- b. Emission Limitations:

9.95 tons per rolling, 12-month period for each individual HAP (for the entire facility)  
24.0 ton per rolling, 12-month period for the combined HAPs (for the entire facility)

Applicable Compliance Method:

Compliance with the HAP emission limitations above shall be demonstrated through the record the keeping required in section C of this permit.

**Eaton Corp**

**DTL Application: 16-02478**

**Facility ID: 1667020046**

**Emissions Unit ID: P018**

**F. Miscellaneous Requirements**

1. All the terms and conditions of this permit are federally enforceable, except Sections C.2, C3, and C4.

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

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

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

**Operations, Property, and/or Equipment - (P019) - KARG Braider K2; Application of reinforcing braid to hoses and plastic tubing using adhesives. Consisting of hose reels, adhesive applicators, braiders, capstan puller and reel coilers.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See sections A.2.a and A.2.b below.
OAC rule 3745-31-05(C)	See B.1.
OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8.0 lbs/hr, or 40.0 lbs/day, on any day when employing any photochemically reactive material (see A.2.b).

**2. Additional Terms and Conditions**

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE, OC (methylene chloride)\*, NO<sub>x</sub>, CO and SO<sub>2</sub> emissions from this air contaminant source since the uncontrolled potential to emit for OC, NO<sub>x</sub>, CO and SO<sub>2</sub> is less than ten tons per year.

\*The potential to emit for OCs (methylene chloride) is 4.36 tons per year.

- 2.b The hourly and daily OC emission limitations of 8 lbs and 40 lbs, respectively, are greater than the emissions unit's potentials to emit. Therefore, no additional monitoring, record keeping, and/or reporting requirements is necessary to ensure compliance with these emission limitations.

**B. Operational Restrictions**

1. The total emissions of each individual HAP, and the total emissions for all combined HAPs from this facility shall not exceed 9.95 tons per rolling, 12-month period, and 24.0 tons per, rolling 12-month period, respectively. To ensure these limits are met,

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Eaton Hydraulics is committing to meet the operational restrictions listed in Section B.2 of this permit.

2. The maximum annual adhesive materials usage for this facility shall not exceed 10,050 gallons based upon a rolling, 12 month summation of the monthly adhesive usage rates.
3. To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage rates for MeCl containing adhesive and the plant-wide emission levels specified in the following Table:

<b>Month(s)</b>	<b>Maximum cumulative Adhesive Material Usage (Gallons)</b>	<b>Maximum Allowable Cumulative Facility-wide Emission of Each Individual HAP (Tons)</b>	<b>Maximum Allowable Cumulative Facility-wide Emission of total Combined HAPS (Tons)</b>
1	1,818	1.8	4
1 - 2	3,636	3.6	8
1 - 3	4,545	4.5	10
1 - 4	5,454	5.4	12
1 - 5	6,364	6.3	14
1 - 6	7,273	7.2	16
1 - 7	9,091	9.0	18
1 - 8	10,050	9.95	20
1 - 9	10,050	9.95	22
1 - 10	10,050	9.95	24
1 - 11	10,050	9.95	24
1 - 12	10,050	9.95	24

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations shall be based on rolling, 12-month summations of the monthly emission rates.

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual adhesive materials usage limitation shall be based on a rolling, 12-month summation of the monthly adhesive materials usage rates.

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

1. The permittee shall collect and record the following information for each month for the entire facility:
  - a. the company identification for each adhesive material employed;
  - b. the number of gallons of each adhesive material employed;
  - c. the number of gallons of all the adhesive materials employed;
  - d. the amount of each individual HAP in each adhesive material employed, in lbs/gallon, as applied;
  - e. the emission rate for each individual HAP from each adhesive material employed (b x d), in lbs;
  - f. the total emission rate for each individual HAP from all the adhesive materials employed (for each individual HAP, the summation of e for all adhesive materials), in lbs;
  - g. the total HAP emission rate for all HAPs combined from all the adhesive materials employed (summation of f for all HAPs for all adhesive materials), in lbs;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons;
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
  - j. for the first 12 months of operation following the issuance of this permit, the cumulative monthly adhesive materials usage rate, in gallons;
  - k. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month adhesive materials usage rate, in gallons; and
  - l. documentation on whether or not any adhesive material employed is considered a photochemically reactive material.
2. The permit to install for this emissions unit P001 through P023 was evaluated based on the actual 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

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"Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MeCl

TLV (mg/m<sup>3</sup>): 173.68

Maximum Hourly Emission Rate (lbs/hr): 7.93

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 118.8

MAGLC (ug/m<sup>3</sup>): 4,135

3. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - 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.).

Emissions Unit ID: P019

4. 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, 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 the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### D. Reporting Requirements

1. The permittee shall submit annual reports to the Akron Regional Air Quality Management District that summarize the actual annual emissions of HAPs for the entire facility. The reports shall be submitted by April 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.95 and 24.0 tons, respectively (for the entire facility); and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations (for the entire facility).
  - b. All exceedances of the rolling, 12-month adhesive coatings usage restriction (for the entire facility),; and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative

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coating usage levels (for the entire facility).

3. The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions of this permit.

**E. Testing Requirements**

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

- a. Emission Limitations:  
8.0 lbs OC / hr  
40.0 lbs OC/ day

Applicable Compliance Method:

The hourly allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of moisture cured urethane of 1.07 pounds/hr by the maximum OC content of 100%, by weight.

The daily allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of the moisture cured urethane of 26.1 pounds/day by the maximum OC content of 100%, by weight.

If required, compliance with the hourly allowable OC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- b. Emission Limitations:

9.95 tons per rolling, 12-month period for each individual HAP (for the entire facility)  
24.0 ton per rolling, 12-month period for the combined HAPs (for the entire facility)

Applicable Compliance Method:

Compliance with the HAP emission limitations above shall be demonstrated through the record the keeping required in section C of this permit.

**Issued: To be entered upon final issuance**

**F. Miscellaneous Requirements**

1. All the terms and conditions of this permit are federally enforceable, except Sections C.2. C3, and C4.

Issued: To be entered upon final issuance

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

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

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

**Operations, Property, and/or Equipment - (P020) - KARG Braider K3; Application of reinforcing braid to hoses and plastic tubing using adhesives. Consisting of hose reels, adhesive applicators, braiders, capstan puller and reel coilers.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See sections A.2.a and A.2.b below.
OAC rule 3745-31-05(C)	See B.1.
OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8.0 lbs/hr, or 40.0 lbs/day, on any day when employing any photochemically reactive material (see A.2.b).

**2. Additional Terms and Conditions**

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE, OC (methylene chloride)\*, NO<sub>x</sub>, CO and SO<sub>2</sub> emissions from this air contaminant source since the uncontrolled potential to emit for OC, NO<sub>x</sub>, CO and SO<sub>2</sub> is less than ten tons per year.

\*The potential to emit for OCs (methylene chloride) is 4.36 tons per year.

- 2.b The hourly and daily OC emission limitations of 8 lbs and 40 lbs, respectively, are greater than the emissions unit's potentials to emit. Therefore, no additional monitoring, record keeping, and/or reporting requirements is necessary to ensure compliance with these emission limitations.

**B. Operational Restrictions**

1. The total emissions of each individual HAP, and the total emissions for all combined HAPs from this facility shall not exceed 9.95 tons per rolling, 12-month period, and 24.0 tons per, rolling 12-month period, respectively. To ensure these limits are met,

**Eaton Corp**

DTL Application: 16-02478

Facility ID: 1667020046

Emissions Unit ID: P020

Eaton Hydraulics is committing to meet the operational restrictions listed in Section B.2 of this permit.

2. The maximum annual adhesive materials usage for this facility shall not exceed 10,050 gallons based upon a rolling, 12 month summation of the monthly adhesive usage rates.
3. To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage rates for MeCl containing adhesive and the plant-wide emission levels specified in the following Table:

Month(s)	Maximum cumulative Adhesive Material Usage (Gallons)	Maximum Allowable Cumulative Facility-wide Emission of Each Individual HAP (Tons)	Maximum Allowable Cumulative Facility-wide Emission of total Combined HAPS (Tons)
1	1,818	1.8	4
1 - 2	3,636	3.6	8
1 - 3	4,545	4.5	10
1 - 4	5,454	5.4	12
1 - 5	6,364	6.3	14
1 - 6	7,273	7.2	16
1 - 7	9,091	9.0	18
1 - 8	10,050	9.95	20
1 - 9	10,050	9.95	22
1 - 10	10,050	9.95	24
1 - 11	10,050	9.95	24
1 - 12	10,050	9.95	24

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations shall be based on rolling, 12-month summations of the monthly emission rates.

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual adhesive materials usage limitation shall be based on a rolling, 12-month summation of the monthly adhesive materials usage rates.

**Issued: To be entered upon final issuance**

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

1. The permittee shall collect and record the following information for each month for the entire facility:
  - a. the company identification for each adhesive material employed;
  - b. the number of gallons of each adhesive material employed;
  - c. the number of gallons of all the adhesive materials employed;
  - d. the amount of each individual HAP in each adhesive material employed, in lbs/gallon, as applied;
  - e. the emission rate for each individual HAP from each adhesive material employed (b x d), in lbs;
  - f. the total emission rate for each individual HAP from all the adhesive materials employed (for each individual HAP, the summation of e for all adhesive materials), in lbs;
  - g. the total HAP emission rate for all HAPs combined from all the adhesive materials employed (summation of f for all HAPs for all adhesive materials), in lbs;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons;
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
  - j. for the first 12 months of operation following the issuance of this permit, the cumulative monthly adhesive materials usage rate, in gallons;
  - k. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month adhesive materials usage rate, in gallons; and
  - l. documentation on whether or not any adhesive material employed is considered a photochemically reactive material.
2. The permit to install for this emissions unit P001 through P023 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system,

Emissions Unit ID: **P020**

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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MeCl

TLV (mg/m<sup>3</sup>): 173.68

Maximum Hourly Emission Rate (lbs/hr): 7.93

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 118.8MAGLC (ug/m<sup>3</sup>): 4,135

3. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - 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.).

**Issued: To be entered upon final issuance**

4. 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, 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 the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**D. Reporting Requirements**

1. The permittee shall submit annual reports to the Akron Regional Air Quality Management District that summarize the actual annual emissions of HAPs for the entire facility. The reports shall be submitted by April 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.95 and 24.0 tons, respectively (for the entire facility); and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations (for the entire facility).
  - b. All exceedances of the rolling, 12-month adhesive coatings usage restriction (for the entire facility),; and for the first 12 calendar months of operation following the

Emissions Unit ID: P020

issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels (for the entire facility).

3. The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions of this permit.

## E. Testing Requirements

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

- a. Emission Limitations:

8.0 lbs OC / hr

40.0 lbs OC/ day

Applicable Compliance Method:

The hourly allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of moisture cured urethane of 0.99 pounds/hr by the maximum OC content of 20%, by weight.

The daily allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of the moisture cured urethane of 26.14 pounds/day by the maximum OC content of 20%, by weight.

If required, compliance with the hourly allowable OC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- b. Emission Limitations:

9.95 tons per rolling, 12-month period for each individual HAP (for the entire facility)

24.0 ton per rolling, 12-month period for the combined HAPs (for the entire facility)

Applicable Compliance Method:

Compliance with the HAP emission limitations above shall be demonstrated through the record the keeping required in section C of this permit.

**Issued: To be entered upon final issuance**

**F. Miscellaneous Requirements**

1. All the terms and conditions of this permit are federally enforceable, except Sections C.2. C3, and C4.

Issued: To be entered upon final issuance

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

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

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

**Operations, Property, and/or Equipment - (P021) - KARG Braider K5; Application of reinforcing braid to hoses and plastic tubing using adhesives. Consisting of hose reels, adhesive applicators, braiders, capstan puller and reel coilers.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See sections A.2.a and A.2.b below.
OAC rule 3745-31-05(C)	See B.1.
OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8.0 lbs/hr, or 40.0 lbs/day, on any day when employing any photochemically reactive material (see A.2.b).

**2. Additional Terms and Conditions**

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE, OC (methylene chloride)\*, NO<sub>x</sub>, CO and SO<sub>2</sub> emissions from this air contaminant source since the uncontrolled potential to emit for OC, NO<sub>x</sub>, CO and SO<sub>2</sub> is less than ten tons per year.

\*The potential to emit for OCs (methylene chloride) is 4.36 tons per year.

- 2.b The hourly and daily OC emission limitations of 8 lbs and 40 lbs, respectively, are greater than the emissions unit's potentials to emit. Therefore, no additional monitoring, record keeping, and/or reporting requirements is necessary to ensure compliance with these emission limitations.

**B. Operational Restrictions**

1. The total emissions of each individual HAP, and the total emissions for all combined HAPs from this facility shall not exceed 9.95 tons per rolling, 12-month period, and 24.0 tons per, rolling 12-month period, respectively. To ensure these limits are met,

**Eaton Corp**

DTL Application: 16-02478

Facility ID: 1667020046

Emissions Unit ID: P021

Eaton Hydraulics is committing to meet the operational restrictions listed in Section B.2 of this permit.

2. The maximum annual adhesive materials usage for this facility shall not exceed 10,050 gallons based upon a rolling, 12 month summation of the monthly adhesive usage rates.
3. To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage rates for MeCl containing adhesive and the plant-wide emission levels specified in the following Table:

Month(s)	Maximum cumulative Adhesive Material Usage (Gallons)	Maximum Allowable Cumulative Facility-wide Emission of Each Individual HAP (Tons)	Maximum Allowable Cumulative Facility-wide Emission of total Combined HAPS (Tons)
1	1,818	1.8	4
1 - 2	3,636	3.6	8
1 - 3	4,545	4.5	10
1 - 4	5,454	5.4	12
1 - 5	6,364	6.3	14
1 - 6	7,273	7.2	16
1 - 7	9,091	9.0	18
1 - 8	10,050	9.95	20
1 - 9	10,050	9.95	22
1 - 10	10,050	9.95	24
1 - 11	10,050	9.95	24
1 - 12	10,050	9.95	24

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations shall be based on rolling, 12-month summations of the monthly emission rates.

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual adhesive materials usage limitation shall be based on a rolling, 12-month summation of the monthly adhesive materials usage rates.

**Issued: To be entered upon final issuance**

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

1. The permittee shall collect and record the following information for each month for the entire facility:
  - a. the company identification for each adhesive material employed;
  - b. the number of gallons of each adhesive material employed;
  - c. the number of gallons of all the adhesive materials employed;
  - d. the amount of each individual HAP in each adhesive material employed, in lbs/gallon, as applied;
  - e. the emission rate for each individual HAP from each adhesive material employed (b x d), in lbs;
  - f. the total emission rate for each individual HAP from all the adhesive materials employed (for each individual HAP, the summation of e for all adhesive materials), in lbs;
  - g. the total HAP emission rate for all HAPs combined from all the adhesive materials employed (summation of f for all HAPs for all adhesive materials), in lbs;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons;
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
  - j. for the first 12 months of operation following the issuance of this permit, the cumulative monthly adhesive materials usage rate, in gallons;
  - k. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month adhesive materials usage rate, in gallons; and
  - l. documentation on whether or not any adhesive material employed is considered a photochemically reactive material.
2. The permit to install for this emissions unit P001 through P023 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system,

Emissions Unit ID: **P021**

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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MeCl

TLV (mg/m<sup>3</sup>): 173.68

Maximum Hourly Emission Rate (lbs/hr): 7.93

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 118.8MAGLC (ug/m<sup>3</sup>): 4,135

3. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - 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.).

**Issued: To be entered upon final issuance**

4. 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, 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 the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

**D. Reporting Requirements**

1. The permittee shall submit annual reports to the Akron Regional Air Quality Management District that summarize the actual annual emissions of HAPs for the entire facility. The reports shall be submitted by April 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.95 and 24.0 tons, respectively (for the entire facility); and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations (for the entire facility).
  - b. All exceedances of the rolling, 12-month adhesive coatings usage restriction (for the entire facility),; and for the first 12 calendar months of operation following the

Emissions Unit ID: P021

issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels (for the entire facility).

3. The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions of this permit.

## E. Testing Requirements

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

- a. Emission Limitations:

8.0 lbs OC / hr

40.0 lbs OC/ day

Applicable Compliance Method:

The hourly allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of moisture cured urethane of 0.99 pound/hr by the maximum OC content of 20%, by weight.

The daily allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of the moisture cured urethane of 26.14 pounds/day by the maximum OC content of 20%, by weight.

If required, compliance with the hourly allowable OC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- b. Emission Limitations:

9.95 tons per rolling, 12-month period for each individual HAP (for the entire facility)

24.0 ton per rolling, 12-month period for the combined HAPs (for the entire facility)

Applicable Compliance Method:

Compliance with the HAP emission limitations above shall be demonstrated through the record the keeping required in section C of this permit.

**Issued: To be entered upon final issuance**

**F. Miscellaneous Requirements**

1. All the terms and conditions of this permit are federally enforceable, except Sections C.2. C3, and C4.

Issued: To be entered upon final issuance

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

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

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

**Operations, Property, and/or Equipment - (P022) - Textile Machine; Application of reinforcing braid to hoses and plastic tubing using adhesives. Consisting of hose reels, adhesive applicators, braiders, capstan puller and reel coilers.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See sections A.2.a and A.2.b below.
OAC rule 3745-31-05(C)	See B.1.
OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8.0 lbs/hr, or 40.0 lbs/day, on any day when employing any photochemically reactive material (see A.2.b).

**2. Additional Terms and Conditions**

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE, OC (methylene chloride)\*, NO<sub>x</sub>, CO and SO<sub>2</sub> emissions from this air contaminant source since the uncontrolled potential to emit for OC, NO<sub>x</sub>, CO and SO<sub>2</sub> is less than ten tons per year.

\*The potential to emit for OCs (methylene chloride) is 4.36 tons per year.

- 2.b The hourly and daily OC emission limitations of 8 lbs and 40 lbs, respectively, are greater than the emissions unit's potentials to emit. Therefore, no additional monitoring, record keeping, and/or reporting requirements is necessary to ensure compliance with these emission limitations.

**B. Operational Restrictions**

1. The total emissions of each individual HAP, and the total emissions for all combined HAPs from this facility shall not exceed 9.95 tons per rolling, 12-month period, and 24.0 tons per, rolling 12-month period, respectively. To ensure these limits are met,

**Eaton Corp**

DTL Application: 16-02478

Facility ID: 1667020046

Emissions Unit ID: P022

Eaton Hydraulics is committing to meet the operational restrictions listed in Section B.2 of this permit.

2. The maximum annual adhesive materials usage for this facility shall not exceed 10,050 gallons based upon a rolling, 12 month summation of the monthly adhesive usage rates.
3. To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage rates for MeCl containing adhesive and the plant-wide emission levels specified in the following Table:

Month(s)	Maximum cumulative Adhesive Material Usage (Gallons)	Maximum Allowable Cumulative Facility-wide Emission of Each Individual HAP (Tons)	Maximum Allowable Cumulative Facility-wide Emission of total Combined HAPS (Tons)
1	1,818	1.8	4
1 - 2	3,636	3.6	8
1 - 3	4,545	4.5	10
1 - 4	5,454	5.4	12
1 - 5	6,364	6.3	14
1 - 6	7,273	7.2	16
1 - 7	9,091	9.0	18
1 - 8	10,050	9.95	20
1 - 9	10,050	9.95	22
1 - 10	10,050	9.95	24
1 - 11	10,050	9.95	24
1 - 12	10,050	9.95	24

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations shall be based on rolling, 12-month summations of the monthly emission rates.

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual adhesive materials usage limitation shall be based on a rolling, 12-month summation of the monthly adhesive materials usage rates.

**Issued: To be entered upon final issuance**

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

1. The permittee shall collect and record the following information for each month for the entire facility:
  - a. the company identification for each adhesive material employed;
  - b. the number of gallons of each adhesive material employed;
  - c. the number of gallons of all the adhesive materials employed;
  - d. the amount of each individual HAP in each adhesive material employed, in lbs/gallon, as applied;
  - e. the emission rate for each individual HAP from each adhesive material employed (b x d), in lbs;
  - f. the total emission rate for each individual HAP from all the adhesive materials employed (for each individual HAP, the summation of e for all adhesive materials), in lbs;
  - g. the total HAP emission rate for all HAPs combined from all the adhesive materials employed (summation of f for all HAPs for all adhesive materials), in lbs;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons;
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
  - j. for the first 12 months of operation following the issuance of this permit, the cumulative monthly adhesive materials usage rate, in gallons;
  - k. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month adhesive materials usage rate, in gallons; and
  - l. documentation on whether or not any adhesive material employed is considered a photochemically reactive material.
2. The permit to install for this emissions unit P001 through P023 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system,

**Issued: To be entered upon final issuance**

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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MeCl

TLV (mg/m<sup>3</sup>): 173.68

Maximum Hourly Emission Rate (lbs/hr): 7.93

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 118.8

MAGLC (ug/m<sup>3</sup>): 4,135

3. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - 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.).

Emissions Unit ID: P022

4. 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, 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 the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### D. Reporting Requirements

1. The permittee shall submit annual reports to the Akron Regional Air Quality Management District that summarize the actual annual emissions of HAPs for the entire facility. The reports shall be submitted by April 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.95 and 24.0 tons, respectively (for the entire facility); and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations (for the entire facility).
  - b. All exceedances of the rolling, 12-month adhesive coatings usage restriction (for the entire facility);, and for the first 12 calendar months of operation following the

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issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels (for the entire facility).

3. The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions of this permit.

**E. Testing Requirements**

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

- a. Emission Limitations:

8.0 lbs OC / hr  
40.0 lbs OC/ day

Applicable Compliance Method:

The hourly allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of moisture cured urethane of 2.3 pounds/hr by the maximum OC content of 20%, by weight.

The daily allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of the moisture cured urethane of 55.42 pounds/day by the maximum OC content of 20%, by weight.

If required, compliance with the hourly allowable OC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- b. Emission Limitations:

9.95 tons per rolling, 12-month period for each individual HAP (for the entire facility)  
24.0 ton per rolling, 12-month period for the combined HAPs (for the entire facility)

Applicable Compliance Method:

Compliance with the HAP emission limitations above shall be demonstrated through the record the keeping required in section C of this permit.

**F. Miscellaneous Requirements**

1. All the terms and conditions of this permit are federally enforceable, except Sections C.2, C3, and C4.

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

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

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

**Operations, Property, and/or Equipment - (P023) - Wardwell Machine; Application of reinforcing braid to hoses and plastic tubing using adhesives. Consisting of hose reels, adhesive applicators, braiders, capstan puller and reel coilers.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See sections A.2.a and A.2.b below.
OAC rule 3745-31-05(C)	See B.1.
OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8.0 lbs/hr, or 40.0 lbs/day, on any day when employing any photochemically reactive material (see A.2.b).

**2. Additional Terms and Conditions**

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE, OC (methylene chloride)\*, NO<sub>x</sub>, CO and SO<sub>2</sub> emissions from this air contaminant source since the uncontrolled potential to emit for OC, NO<sub>x</sub>, CO and SO<sub>2</sub> is less than ten tons per year.

\*The potential to emit for OCs (methylene chloride) is 4.36 tons per year.

- 2.b The hourly and daily OC emission limitations of 8 lbs and 40 lbs, respectively, are greater than the emissions unit's potentials to emit. Therefore, no additional monitoring, record keeping, and/or reporting requirements is necessary to ensure compliance with these emission limitations.

**B. Operational Restrictions**

1. The total emissions of each individual HAP, and the total emissions for all combined HAPs from this facility shall not exceed 9.95 tons per rolling, 12-month period, and 24.0 tons per, rolling 12-month period, respectively. To ensure these limits are met,

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Eaton Hydraulics is committing to meet the operational restrictions listed in Section B.2 of this permit.

2. The maximum annual adhesive materials usage for this facility shall not exceed 10,050 gallons based upon a rolling, 12 month summation of the monthly adhesive usage rates.
3. To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage rates for MeCl containing adhesive and the plant-wide emission levels specified in the following Table:

<b>Month(s)</b>	<b>Maximum cumulative Adhesive Material Usage (Gallons)</b>	<b>Maximum Allowable Cumulative Facility-wide Emission of Each Individual HAP (Tons)</b>	<b>Maximum Allowable Cumulative Facility-wide Emission of total Combined HAPS (Tons)</b>
1	1,818	1.8	4
1 - 2	3,636	3.6	8
1 - 3	4,545	4.5	10
1 - 4	5,454	5.4	12
1 - 5	6,364	6.3	14
1 - 6	7,273	7.2	16
1 - 7	9,091	9.0	18
1 - 8	10,050	9.95	20
1 - 9	10,050	9.95	22
1 - 10	10,050	9.95	24
1 - 11	10,050	9.95	24
1 - 12	10,050	9.95	24

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations shall be based on rolling, 12-month summations of the monthly emission rates.

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual adhesive materials usage limitation shall be based on a rolling, 12-month summation of the monthly adhesive materials usage rates.

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

1. The permittee shall collect and record the following information for each month for the entire facility:
  - a. the company identification for each adhesive material employed;
  - b. the number of gallons of each adhesive material employed;
  - c. the number of gallons of all the adhesive materials employed;
  - d. the amount of each individual HAP in each adhesive material employed, in lbs/gallon, as applied;
  - e. the emission rate for each individual HAP from each adhesive material employed (b x d), in lbs;
  - f. the total emission rate for each individual HAP from all the adhesive materials employed (for each individual HAP, the summation of e for all adhesive materials), in lbs;
  - g. the total HAP emission rate for all HAPs combined from all the adhesive materials employed (summation of f for all HAPs for all adhesive materials), in lbs;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons;
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
  - j. for the first 12 months of operation following the issuance of this permit, the cumulative monthly adhesive materials usage rate, in gallons;
  - k. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month adhesive materials usage rate, in gallons; and
  - l. documentation on whether or not any adhesive material employed is considered a photochemically reactive material.
2. The permit to install for this emissions unit P001 through P023 was evaluated based on the actual 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

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"Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MeCl

TLV (mg/m<sup>3</sup>): 173.68

Maximum Hourly Emission Rate (lbs/hr): 7.93

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 118.8

MAGLC (ug/m<sup>3</sup>): 4,135

3. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - 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.).

Emissions Unit ID: P023

4. 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, 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 the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### D. Reporting Requirements

1. The permittee shall submit annual reports to the Akron Regional Air Quality Management District that summarize the actual annual emissions of HAPs for the entire facility. The reports shall be submitted by April 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.95 and 24.0 tons, respectively (for the entire facility); and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations (for the entire facility).
  - b. All exceedances of the rolling, 12-month adhesive coatings usage restriction (for the entire facility),; and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative

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coating usage levels (for the entire facility).

3. The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions of this permit.

**E. Testing Requirements**

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

- a. Emission Limitations:  
8.0 lbs OC / hr  
40.0 lbs OC/ day

Applicable Compliance Method:

The hourly allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of moisture cured urethane of 0.002 pound/hr by the maximum OC content of 20%, by weight.

The daily allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of the moisture cured urethane of 0.05 pound/day by the maximum OC content of 20%, by weight.

If required, compliance with the hourly allowable OC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- b. Emission Limitations:

9.95 tons per rolling, 12-month period for each individual HAP (for the entire facility)  
24.0 ton per rolling, 12-month period for the combined HAPs (for the entire facility)

Applicable Compliance Method:

Compliance with the HAP emission limitations above shall be demonstrated through the record the keeping required in section C of this permit.

**Eaton Corp**

**DTL Application: 16-02478**

**Facility ID: 1667020046**

**Emissions Unit ID: P023**

**F. Miscellaneous Requirements**

1. All the terms and conditions of this permit are federally enforceable, except Sections C.2, C3, and C4.

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

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

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

**Operations, Property, and/or Equipment - (R001) - Precoater 1; Application of adhesives to hoses and plastic tubing. Consisting of hose reels, adhesive applicators, capstan puller and reel coilers.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See sections A.2.a and A.2.b below.
OAC rule 3745-31-05(C)	See B.1.
OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8.0 lbs/hr, or 40.0 lbs/day, on any day when employing any photochemically reactive material (see A.2.b).

**2. Additional Terms and Conditions**

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE, OC (methylene chloride)\*, NO<sub>x</sub>, CO and SO<sub>2</sub> emissions from this air contaminant source since the uncontrolled potential to emit for OC, NO<sub>x</sub>, CO and SO<sub>2</sub> is less than ten tons per year.

\*The potential to emit for OCs (methylene chloride) is 4.36 tons per year.

- 2.b The hourly and daily OC emission limitations of 8 lbs and 40 lbs, respectively, are greater than the emissions unit's potentials to emit. Therefore, no additional monitoring, record keeping, and/or reporting requirements is necessary to ensure compliance with these emission limitations.

**B. Operational Restrictions**

1. The total emissions of each individual HAP, and the total emissions for all combined HAPs from this facility shall not exceed 9.95 tons per rolling, 12-month period, and 24.0 tons per, rolling 12-month period, respectively. To ensure these limits are met,

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Eaton Hydraulics is committing to meet the operational restrictions listed in Section B.2 of this permit.

2. The maximum annual adhesive materials usage for this facility shall not exceed 10,050 gallons based upon a rolling, 12 month summation of the monthly adhesive usage rates.
3. To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage rates for MeCl containing adhesive and the plant-wide emission levels specified in the following Table:

<b>Month(s)</b>	<b>Maximum cumulative Adhesive Material Usage (Gallons)</b>	<b>Maximum Allowable Cumulative Facility-wide Emission of Each Individual HAP (Tons)</b>	<b>Maximum Allowable Cumulative Facility-wide Emission of total Combined HAPS (Tons)</b>
1	1,818	1.8	4
1 - 2	3,636	3.6	8
1 - 3	4,545	4.5	10
1 - 4	5,454	5.4	12
1 - 5	6,364	6.3	14
1 - 6	7,273	7.2	16
1 - 7	9,091	9.0	18
1 - 8	10,050	9.95	20
1 - 9	10,050	9.95	22
1 - 10	10,050	9.95	24
1 - 11	10,050	9.95	24
1 - 12	10,050	9.95	24

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations shall be based on rolling, 12-month summations of the monthly emission rates.

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual adhesive materials usage limitation shall be based on a rolling, 12-month summation of the monthly adhesive materials usage rates.

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

1. The permittee shall collect and record the following information for each month for the entire facility:
  - a. the company identification for each adhesive material employed;
  - b. the number of gallons of each adhesive material employed;
  - c. the number of gallons of all the adhesive materials employed;
  - d. the amount of each individual HAP in each adhesive material employed, in lbs/gallon, as applied;
  - e. the emission rate for each individual HAP from each adhesive material employed (b x d), in lbs;
  - f. the total emission rate for each individual HAP from all the adhesive materials employed (for each individual HAP, the summation of e for all adhesive materials), in lbs;
  - g. the total HAP emission rate for all HAPs combined from all the adhesive materials employed (summation of f for all HAPs for all adhesive materials), in lbs;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons;
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
  - j. for the first 12 months of operation following the issuance of this permit, the cumulative monthly adhesive materials usage rate, in gallons;
  - k. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month adhesive materials usage rate, in gallons; and
  - l. documentation on whether or not any adhesive material employed is considered a photochemically reactive material.

**D. Reporting Requirements**

**Issued: To be entered upon final issuance**

1. The permittee shall submit annual reports to the Akron Regional Air Quality Management District that summarize the actual annual emissions of HAPs for the entire facility. The reports shall be submitted by April 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.95 and 24.0 tons, respectively (for the entire facility); and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations (for the entire facility).
  - b. All exceedances of the rolling, 12-month adhesive coatings usage restriction (for the entire facility),; and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels (for the entire facility).
3. The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions of this permit.

**E. Testing Requirements**

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

- a. Emission Limitations:

8.0 lbs OC / hr  
40.0 lbs OC/ day

Applicable Compliance Method:

The hourly allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of adhesive 2158 of 2.47 pounds/hr by the maximum OC content of 20%, by weight.

The daily allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of adhesive 2158 of 59.28 pounds/day by the maximum OC content of 20%, by weight.

Emissions Unit ID: **R001**

**Issued: To be entered upon final issuance**

If required, compliance with the hourly allowable OC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

**Issued: To be entered upon final issuance**

b. Emission Limitations:

9.95 tons per rolling, 12-month period for each individual HAP (for the entire facility)

24.0 ton per rolling, 12-month period for the combined HAPs (for the entire facility)

Applicable Compliance Method:

Compliance with the HAP emission limitations above shall be demonstrated through the record the keeping required in section C of this permit.

**F. Miscellaneous Requirements**

1. All the terms and conditions of this permit are federally enforceable.

**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.

**Operations, Property, and/or Equipment - (R002) - Precoater 2; Application of adhesives to hoses and plastic tubing. Consisting of hose reels, adhesive applicators, capstan puller and reel coilers.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See sections A.2.a and A.2.b below.
OAC rule 3745-31-05(C)	See B.1.
OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8.0 lbs/hr, or 40.0 lbs/day, on any day when employing any photochemically reactive material (see A.2.b).

**2. Additional Terms and Conditions**

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE, OC (methylene chloride)\*, NO<sub>x</sub>, CO and SO<sub>2</sub> emissions from this air contaminant source since the uncontrolled potential to emit for OC, NO<sub>x</sub>, CO and SO<sub>2</sub> is less than ten tons per year.

\*The potential to emit for OCs (methylene chloride) is 4.36 tons per year.

- 2.b The hourly and daily OC emission limitations of 8 lbs and 40 lbs, respectively, are greater than the emissions unit's potentials to emit. Therefore, no additional monitoring, record keeping, and/or reporting requirements is necessary to ensure compliance with these emission limitations.

**B. Operational Restrictions**

1. The total emissions of each individual HAP, and the total emissions for all combined HAPs from this facility shall not exceed 9.95 tons per rolling, 12-month period, and 24.0 tons per, rolling 12-month period, respectively. To ensure these limits are met, Eaton Hydraulics is committing to meet the operational restrictions listed in Section B.2

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of this permit.

2. The maximum annual adhesive materials usage for this facility shall not exceed 10,050 gallons based upon a rolling, 12 month summation of the monthly adhesive usage rates.
3. To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage rates for MeCl containing adhesive and the plant-wide emission levels specified in the following Table:

<b>Month(s)</b>	<b>Maximum cumulative Adhesive Material Usage (Gallons)</b>	<b>Maximum Allowable Cumulative Facility-wide Emission of Each Individual HAP (Tons)</b>	<b>Maximum Allowable Cumulative Facility-wide Emission of total Combined HAPS (Tons)</b>
1	1,818	1.8	4
1 - 2	3,636	3.6	8
1 - 3	4,545	4.5	10
1 - 4	5,454	5.4	12
1 - 5	6,364	6.3	14
1 - 6	7,273	7.2	16
1 - 7	9,091	9.0	18
1 - 8	10,050	9.95	20
1 - 9	10,050	9.95	22
1 - 10	10,050	9.95	24
1 - 11	10,050	9.95	24
1 - 12	10,050	9.95	24

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitations shall be based on rolling, 12-month summations of the monthly emission rates.

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual adhesive materials usage limitation shall be based on a rolling, 12-month summation of the monthly adhesive materials usage rates.

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

1. The permittee shall collect and record the following information for each month for the entire facility:
  - a. the company identification for each adhesive material employed;
  - b. the number of gallons of each adhesive material employed;
  - c. the number of gallons of all the adhesive materials employed;
  - d. the amount of each individual HAP in each adhesive material employed, in lbs/gallon, as applied;
  - e. the emission rate for each individual HAP from each adhesive material employed (b x d), in lbs;
  - f. the total emission rate for each individual HAP from all the adhesive materials employed (for each individual HAP, the summation of e for all adhesive materials), in lbs;
  - g. the total HAP emission rate for all HAPs combined from all the adhesive materials employed (summation of f for all HAPs for all adhesive materials), in lbs;
  - h. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons;
  - i. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.
  - j. for the first 12 months of operation following the issuance of this permit, the cumulative monthly adhesive materials usage rate, in gallons;
  - k. after the first 12 months of operation following the issuance of this permit, the rolling, 12-month adhesive materials usage rate, in gallons; and
  - l. documentation on whether or not any adhesive material employed is considered a photochemically reactive material.

**D. Reporting Requirements**

Emissions Unit ID: R002

1. The permittee shall submit annual reports to the Akron Regional Air Quality Management District that summarize the actual annual emissions of HAPs for the entire facility. The reports shall be submitted by April 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
  - a. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.95 and 24.0 tons, respectively (for the entire facility); and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative individual HAP and combined HAPs emission limitations (for the entire facility).
  - b. All exceedances of the rolling, 12-month adhesive coatings usage restriction (for the entire facility),; and for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels (for the entire facility).
3. The quarterly deviation (excursion) reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions of this permit.

#### E. Testing Requirements

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

- a. Emission Limitations:  
8.0 lbs OC / hr  
40.0 lbs OC/ day

Applicable Compliance Method:

The hourly allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of adhesive 2158 of 2.47 pounds/hr by the maximum OC content of 20%, by weight.

The daily allowable OC emission limitation shall be demonstrated by multiplying the maximum usage rate of adhesive 2158 of 59.28 pounds/day by the maximum OC content of 20%, by weight.

Emissions Unit ID: **R002**

**Issued: To be entered upon final issuance**

If required, compliance with the hourly allowable OC emission limitation shall be based on stack testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

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b. Emission Limitations:

9.95 tons per rolling, 12-month period for each individual HAP (for the entire facility)

24.0 ton per rolling, 12-month period for the combined HAPs (for the entire facility)

Applicable Compliance Method:

Compliance with the HAP emission limitations above shall be demonstrated through the record the keeping required in section C of this permit.

**F. Miscellaneous Requirements**

1. All the terms and conditions of this permit are federally enforceable.