



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184
www.epa.state.oh.us

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

7/22/2008

Terry Coleman
Airstream, Inc.
419 West Pike Street
Jackson Center, OH 45334

Certified Mail

Facility ID: 0575000095
Permit Number: P0088832
County: Shelby

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 4/9/2008. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page <http://www.epa.state.oh.us/dapc> in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter.

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
Columbus, Ohio 43215

and Ohio EPA DAPC, Southwest District Office
401 East Fifth Street
Dayton, OH 45402

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.

If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA DAPC, Southwest District Office

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director



**State of Ohio Environmental Protection Agency
Division of Air Pollution Control**

PRELIMINARY PROPOSED

Air Pollution Title V Permit for Airstream, Inc.

Facility ID: 0575000095

Permit Number: P0088832

Permit Type: Renewal

Issued: 7/22/2008

Effective: To be entered upon final issuance

Expiration: To be entered upon final issuance



State of Ohio Environmental Protection Agency
 Division of Air Pollution Control

Air Pollution Title V Permit
 for
 Airstream, Inc.

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State of Ohio Environmental Protection Agency
Division of Air Pollution Control

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State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Preliminary Proposed Title V Permit

Permit Number: P0088832

Facility ID: 0575000095

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0575000095
Facility Description: Manufactures recreational vehicles
Application Number(s): A0020033, A0020034
Permit Number: P0088832
Permit Description: Airstream Title V Renewal
Permit Type: Renewal
Issue Date: 7/22/2008
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number:

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Airstream, Inc.
419 West Pike Street
Jackson Center, OH 45334

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Southwest District Office
401 East Fifth Street
Dayton, OH 45402
(937)285-6357

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Southwest District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Preliminary Proposed Title V Permit

Permit Number: P0088832

Facility ID: 0575000095

Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
 - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
 - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting
 - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include 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.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))
- c) The permittee shall submit required reports in the following manner:
 - (1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:



Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) constitutes a violation of an emission limitation (or control requirement) and, therefore, is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- (2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.



These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- (3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.



If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

- (4) Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

- (5) Reports of any required monitoring and/or record keeping information shall be submitted to Ohio EPA DAPC, Southwest District Office.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance 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). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. Title IV Provisions

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

(Authority for term: OAC rule 3745-77-07(A)(5))



6. Severability Clause

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

(Authority for term: OAC rule 3745-77-07(A)(6))

7. General Requirements

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.
- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
 - (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
 - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
 - (3) a combination of (1) and (2) above.



The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. 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.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.



- c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.
(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

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

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.



- (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
 - (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.
 - (2) Compliance certifications shall include the following:
 - (a) An identification of each term or condition of this permit that is the basis of the certification.
 - (b) The permittee's current compliance status.
 - (c) Whether compliance was continuous or intermittent.
 - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
 - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
 - (3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.
(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

- a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.
(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does



not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.



(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. 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.

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the



emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.
(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or record keeping 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 (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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.)



25. Records Retention Requirements Under State Law Only

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.

26. Inspections and Information Requests

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

(Authority for term: OAC rule 3745-77-07(C))

27. 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).

28. 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.

(Authority for term: OAC rule 3745-77-01(C))

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report,



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which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or
- c) where the company's responsible official has certified that an emissions unit has been permanently shut down.



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B. Facility-Wide Terms and Conditions



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) 3.
2. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirement contained in a permit-to-install or in the SIP-approved versions of OAC Chapters 3745-17, 3745-18 and 3745-21.
 - a) B001 Make up air unit.
3. The following insignificant emissions units are exempt from permit requirements because they are not subject to any applicable requirements or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:
 - a) Z002 Adhesive & water application carriage
 - b) Z006 Spray booth Bldg. 106.



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C. Emissions Unit Terms and Conditions



1. K002, Spray Booth - Building 103- West

Operations, Property and/or Equipment Description:

West Paint Spray Booth. Wiping of old coating with thinner; coating of misc. parts & trailers

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) b)(1)e., g)(1), g)(2) and g)(3).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) and PTI: 05-14383	<p>Volatile organic compound (VOC) emissions shall not exceed 3.5 pounds per hour, excluding cleanup materials.</p> <p>VOC content shall not exceed 3.5 pounds per gallon of coating, excluding water and exempt solvent and 3.04 lbs/ gallon of liquid organic cleanup materials.</p> <p>VOC emissions shall not exceed 16.85 tons per rolling, 12-month summation with cleanup materials.</p> <p>Emissions from natural gas combustion in the drying oven (0.99 mmBtu/hr) :</p> <p>0.10 lbs/hr and 0.43 tons/yr NO_x; 0.08 lb/hr and 0.36 tons/yr CO; 0.01 lb/hr and 0.03 ton/yr filterable PM; 0.001 lb/hr and 0.003 ton/yr SO₂; and 0.01 lb/hr and 0.02 ton/yr VOC.</p> <p>b)(2)a.</p>
b.	OAC rule 3745-21-09(U)	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC Rule 3745-17-11(B)	PE shall not exceed 0.551 lb PE/hr
		b)(2)c. and b)(2)d.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC Rule 3745-17-07(A)	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-114-01	Air Toxic Policy
f.	OAC rule 3745-17-11(C)	b)(2)e.

(2) Additional Terms and Conditions

- a. The hourly emission limitation for VOC of 3.5 pounds, is established to reflect potential to emit for this emission unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.
- b. This emissions limitation reflects the current State Implementation Plan (SIP) for Ohio approved by the U.S. EPA. Ohio EPA has requested that this emissions limitation be modified to reflect compliance with the requirements of OAC rule 3745-17-11(C), but the new requirements will not become federally enforceable until it is approved by U.S. EPA as revision to the Ohio SIP for particulate emissions.
- c. The particulate matter emission limit is derived based on the equation noted with Table 1 from OAC Rule 3745-11. Figure II does not apply (per OAC rule 3745-17-11(A)(2)(a)(i)) because the uncontrolled mass rate of particulate emissions cannot be determined.
- d. This emissions limitation reflects the current State Implementation Plan (SIP) for Ohio approved by the U.S. EPA. Ohio EPA has requested that this emissions limitation be modified to reflect compliance with the requirements of OAC rule 3745-17-11(C), but the new requirements will not become federally enforceable until it is approved by U.S. EPA as revision to the Ohio SIP for particulate emissions.
- e. The permittee shall operate the filter system for the coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual, with any modifications deemed necessary by the permittee. The filter system shall be employed during all periods of coating application to control particulate emissions.

c) Operational Restrictions

- (1) The permittee shall burn only natural gas in this emission unit.
- (2) Coating and Liquid Organic Cleanup Materials employed in this emission unit shall not exceed: 8760 gallons per rolling 12-month period; and 1000 gallons per rolling 12-month period, respectively.
- (3) This emission unit shall be equipped with a filter system that shall minimize or eliminate all particulate emissions from the painting operation.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for the line:
 - a. the name and identification number of each coating, as applied; and
 - b. the VOC content of each coating (excluding water and exempt solvents), as applied.
- (2) The permittee shall collect and record the following information for each month for the purpose of determining annual VOC emissions:
 - a. the name and identification of each cleanup material employed
 - b. the VOC content of each cleanup material, in pounds per gallon;
 - c. the number of gallons of each cleanup material employed;
 - d. the number of gallons (excluding water and exempt solvents) of each coating employed; and
 - e. the total VOC emissions from all coatings and cleanup materials employed, in tons.
- (3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the filter system with any modifications deemed necessary by the permittee during the time period in which the filter is utilized. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (4) The permittee shall conduct periodic inspections of the filter system to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee. The periodic inspections of the filter system shall be performed at a frequency that is based upon the recommendation of the manufacturer, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, the permittee shall conduct a comprehensive inspection of the filter system, not less than once each calendar year, while the emissions unit is shut down; and shall perform any needed maintenance and repair for the control device to ensure that it is operated in accordance with the manufacturer's recommendations.

The permittee shall document each inspection of the filter system by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection. These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (5) In the event that the filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the filter system shall be expeditiously repaired or otherwise



returned to operation in accordance with such requirements. The permittee shall maintain a record of those periods when the filter system is not operating in accordance with such requirements. These records shall be maintained at the facility for not less than five years from the date of completion and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

e) Reporting Requirements

- (1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Southwest District Office, Division of Air Pollution Control) within 30 days following the end of the calendar month.

The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

- (2) The permittee shall include in the quarterly report any record of the date and length of time the filter system was not in service during coating application. The quarterly report shall be submitted by January 31st, April 30th, July 31st, and October 31st of each year to the Ohio EPA Southwest District Office, Division of Air Pollution Control.

f) Testing Requirements

- (1) Compliance with the maximum hourly VOC emission limitations for this emissions unit shall be determined based on the following equations:

$$Ve = (Cu \times Hvoc) + (Fu \times Fvoc)$$

where:

Ve= VOC maximum hourly emission rate, in lbs per hour;

Cu= the maximum amount of coatings that can be used, in gallons per hour, (1 gallon/hr); and

Cvoc= the maximum VOC content of the coatings that can be used, in lbs per gallon, (3.5 lbs of VOC/gallon, excluding exempt solvents and water).

This facility shall maintain records that demonstrate the maximum VOC emissions from above mentioned emissions units. These records shall constitute continuous record keeping as long as there is no increase in the maximum hourly emissions from the above emissions units. If this operation should be modified so as to change the maximum usage of and/or VOC content of the above listed materials, this facility shall demonstrate such changes will not cause an exceedances of the 3.5 pound per hour limitation, prior to initiating the modifications.

- (2) Compliance with the maximum annual VOC emission limitations from the coating and liquid organic compound cleanup materials used in this emissions unit shall be determined based on the following equations:



$$V_a = ((M_{voc} + (M_{voc11}))$$

where:

V_a = the total VOC emission for the previous 12 month period;

M_{voc} = the monthly VOC emissions (d)(2)); and

M_{voc11} = the total VOC emissions from the prior 11 month period.

This facility shall maintain records that demonstrate the maximum VOC emissions from above mentioned emissions units. These records shall constitute continuous record keeping as long as there is no increase in the maximum annual emissions from the above emissions unit.

g) **Miscellaneous Requirements**

- (1) The permit to install for this emissions unit 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 for each pollutant emitted by this emissions unit using data from the permit to install application. The predicted 1-hour Maximum In-Stack concentration was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Acetone

TLV (ppm): 500

Maximum Hourly Emission Rate (lbs/hr): 1.95

Predicted 1-Hour Maximum In-Stack Concentration (ppm): 0.651

MAGLC (ppm): 11.90

Pollutant: Butyl Acetate

TLV (ppm): 150

Maximum Hourly Emission Rate (lbs/hr): 1.66

Predicted 1-Hour Maximum In-Stack Concentration (ppm): 0.553

MAGLC (ppm): 3.57

Pollutant: Ethyl Benzene

TLV (ppm): 100

Maximum Hourly Emission Rate (lbs/hr): 0.06

Predicted 1-Hour Maximum In-Stack Concentration (ppm): 0.02



MAGLC (ppm): 2.38

Pollutant: Ethylene Glycol Monobutyl Ether Acetate

TLV (ppm): 5

Maximum Hourly Emission Rate (lbs/hr): 0.06

Predicted 1-Hour Maximum In-Stack Concentration (ppm): 0.02

MAGLC (ppm): 0.12

Pollutant: Xylene

TLV (ppm): 100

Maximum Hourly Emission Rate (lbs/hr): 1.11

Predicted 1-Hour Maximum In-Stack Concentration (ppm): 0.37

MAGLC (ppm): 2.38

Pollutant: Heptane

TLV (ppm): 400

Maximum Hourly Emission Rate (lbs/hr): 0.13

Predicted 1-Hour Maximum In-Stack Concentration (ppm): 0.04

MAGLC (ppm): 9.52

Pollutant: Methyl Isobutyl Ketone

TLV (ppm): 50

Maximum Hourly Emission Rate (lbs/hr): 0.15

Predicted 1-Hour Maximum In-Stack Concentration (ppm): 0.05

MAGLC (ppm): 1.19

Pollutant: Toluene

TLV (ppm): 50

Maximum Hourly Emission Rate (lbs/hr): 0.25

Predicted 1-Hour Maximum In-Stack Concentration (ppm): 0.08

MAGLC (ppm): 1.19

Pollutant: VM&P Naphtha



TLV (ppm): 300

Maximum Hourly Emission Rate (lbs/hr): 0.70

Predicted 1-Hour Maximum In-Stack Concentration (ppm): 0.24

MAGLC (ppm): 7.14

Pollutant: Methyl Propyl Ketone

TLV (ppm): 200

Maximum Hourly Emission Rate (lbs/hr): 0.01

Predicted 1-Hour Maximum In-Stack Concentration (ppm): 0.18

MAGLC (ppm): 4.76

- (2) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
- (3) 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:"



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- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

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.



2. K003, Spray Booth - Building 103 - East

Operations, Property and/or Equipment Description:

West Paint Spray Booth. Wiping of old coating with thinner; coating of misc. parts & trailers

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) b)(1)e., g)(1), g)(2) and g)(3).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) and PTI: 05-14383	<p>Volatile organic compound (VOC) emissions shall not exceed 3.5 pounds per hour, excluding cleanup materials.</p> <p>VOC content shall not exceed 3.5 pounds per gallon of coating, excluding water and exempt solvent and 3.04 lbs/ gallon of liquid organic cleanup materials.</p> <p>VOC emissions shall not exceed 16.85 tons per rolling, 12-month summation with cleanup materials.</p> <p>Emissions from natural gas combustion in the drying oven (0.99 mmBtu/hr) :</p> <p>0.10 lbs/hr and 0.43 tons/yr NOx; 0.08 lb/hr and 0.36 tons/yr CO; 0.01 lb/hr and 0.03 ton/yr filterable PM; 0.001 lb/hr and 0.003 ton/yr SO2; and 0.01 lb/hr and 0.02 ton/yr VOC.</p> <p>b)(2)a.</p>
b.	OAC rule 3745-21-09(U)	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC Rule 3745-17-11(B)	PE shall not exceed 0.551 lb PE/hr
		b)(2)c. and b)(2)d.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC Rule 3745-17-07(A)	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-114-01	Air Toxic Policy
f.	OAC rule 3745-17-11(C)	b)(2)e.

(2) Additional Terms and Conditions

- a. The hourly emission limitation for VOC of 3.5 pounds, is established to reflect potential to emit for this emission unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.
- b. This emissions limitation reflects the current State Implementation Plan (SIP) for Ohio approved by the U.S. EPA. Ohio EPA has requested that this emissions limitation be modified to reflect compliance with the requirements of OAC rule 3745-17-11(C), but the new requirements will not become federally enforceable until it is approved by U.S. EPA as revision to the Ohio SIP for particulate emissions.
- c. The particulate matter emission limit is derived based on the equation noted with Table 1 from OAC Rule 3745-11. Figure II does not apply (per OAC rule 3745-17-11(A)(2)(a)(i)) because the uncontrolled mass rate of particulate emissions cannot be determined.
- d. This emissions limitation reflects the current State Implementation Plan (SIP) for Ohio approved by the U.S. EPA. Ohio EPA has requested that this emissions limitation be modified to reflect compliance with the requirements of OAC rule 3745-17-11(C), but the new requirements will not become federally enforceable until it is approved by U.S. EPA as revision to the Ohio SIP for particulate emissions.
- e. The permittee shall operate the filter system for the coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual, with any modifications deemed necessary by the permittee. The filter system shall be employed during all periods of coating application to control particulate emissions.

c) Operational Restrictions

- (1) The permittee shall burn only natural gas in this emission unit.
- (2) Coating and Liquid Organic Cleanup Materials employed in this emission unit shall not exceed: 8760 gallons per rolling 12-month period; and 1000 gallons per rolling 12-month period, respectively.
- (3) This emission unit shall be equipped with a filter system that shall minimize or eliminate all particulate emissions from the painting operation.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for the line:
 - a. the name and identification number of each coating, as applied; and
 - b. the VOC content of each coating (excluding water and exempt solvents), as applied.
- (2) The permittee shall collect and record the following information for each month for the purpose of determining annual VOC emissions:
 - a. the name and identification of each cleanup material employed
 - b. the VOC content of each cleanup material, in pounds per gallon;
 - c. the number of gallons of each cleanup material employed;
 - d. the number of gallons (excluding water and exempt solvents) of each coating employed; and
 - e. the total VOC emissions from all coatings and cleanup materials employed, in tons.
- (3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the filter system with any modifications deemed necessary by the permittee during the time period in which the filter is utilized. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (4) The permittee shall conduct periodic inspections of the filter system to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee. The periodic inspections of the filter system shall be performed at a frequency that is based upon the recommendation of the manufacturer, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, the permittee shall conduct a comprehensive inspection of the filter system, not less than once each calendar year, while the emissions unit is shut down; and shall perform any needed maintenance and repair for the control device to ensure that it is operated in accordance with the manufacturer's recommendations.

The permittee shall document each inspection of the filter system by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection. These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (5) In the event that the filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the filter system shall be expeditiously repaired or otherwise



returned to operation in accordance with such requirements. The permittee shall maintain a record of those periods when the filter system is not operating in accordance with such requirements. These records shall be maintained at the facility for not less than five years from the date of completion and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

e) Reporting Requirements

- (1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Southwest District Office, Division of Air Pollution Control) within 30 days following the end of the calendar month.

The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

- (2) The permittee shall include in the quarterly report any record of the date and length of time the filter system was not in service during coating application. The quarterly report shall be submitted by January 31st, April 30th, July 31st, and October 31st of each year to the Ohio EPA, Southwest District Office, Division of Air Pollution Control.

f) Testing Requirements

- (1) Compliance with the maximum hourly VOC emission limitations for this emissions unit shall be determined based on the following equations.

$$Ve = (Cu \times Hvoc) + (Fu \times Fvoc)$$

where:

Ve= VOC maximum hourly emission rate, in lbs per hour;

Cu= the maximum amount of coatings that can be used, in gallons per hour, (1 gallon/hr); and

Cvoc= the maximum VOC content of the coatings that can be used, in lbs per gallon, (3.5 lbs of VOC/gallon, excluding exempt solvents and water).

This facility shall maintain records that demonstrate the maximum VOC emissions from above mentioned emissions units. These records shall constitute continuous record keeping as long as there is no increase in the maximum hourly emissions from the above emissions units. If this operation should be modified so as to change the maximum usage of and/or VOC content of the above listed materials, this facility shall demonstrate such changes will not cause an exceedances of the 3.5 pound per hour limitation, prior to initiating the modifications.

- (2) Compliance with the maximum annual VOC emission limitations from the coating and liquid organic compound cleanup materials used in this emissions unit shall be determined based on the following equations:



$$V_a = (M_{voc} + (M_{voc11}))$$

where:

V_a = the total VOC emission for the previous 12 month period;

M_{voc} = the monthly VOC emissions (d)(2); and

M_{voc11} = the total VOC emissions from the prior 11 month period.

This facility shall maintain records that demonstrate the maximum VOC emissions from above mentioned emissions units. These records shall constitute continuous record keeping as long as there is no increase in the maximum annual emissions from the above emissions unit.

g) **Miscellaneous Requirements**

- (1) The permit to install for this emissions unit 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 for each pollutant emitted by this emissions unit using data from the permit to install application. The predicted 1-hour Maximum In-Stack concentration was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Acetone

TLV (ppm): 500

Maximum Hourly Emission Rate (lbs/hr): 1.95

Predicted 1-Hour Maximum In-Stack Concentration (ppm): 0.651

MAGLC (ppm): 11.90

Pollutant: Butyl Acetate

TLV (ppm): 150

Maximum Hourly Emission Rate (lbs/hr): 1.66

Predicted 1-Hour Maximum In-Stack Concentration (ppm): 0.553

MAGLC (ppm): 3.57

Pollutant: Ethyl Benzene

TLV (ppm): 100

Maximum Hourly Emission Rate (lbs/hr): 0.06

Predicted 1-Hour Maximum In-Stack Concentration (ppm): 0.02



MAGLC (ppm): 2.38

Pollutant: Ethylene Glycol Monobutyl Ether Acetate

TLV (ppm): 5

Maximum Hourly Emission Rate (lbs/hr): 0.06

Predicted 1-Hour Maximum In-Stack Concentration (ppm): 0.02

MAGLC (ppm): 0.12

Pollutant: Xylene

TLV (ppm): 100

Maximum Hourly Emission Rate (lbs/hr): 1.11

Predicted 1-Hour Maximum In-Stack Concentration (ppm): 0.37

MAGLC (ppm): 2.38

Pollutant: Heptane

TLV (ppm): 400

Maximum Hourly Emission Rate (lbs/hr): 0.13

Predicted 1-Hour Maximum In-Stack Concentration (ppm): 0.04

MAGLC (ppm): 9.52

Pollutant: Methyl Isobutyl Ketone

TLV (ppm): 50

Maximum Hourly Emission Rate (lbs/hr): 0.15

Predicted 1-Hour Maximum In-Stack Concentration (ppm): 0.05

MAGLC (ppm): 1.19

Pollutant: Toluene

TLV (ppm): 50

Maximum Hourly Emission Rate (lbs/hr): 0.25

Predicted 1-Hour Maximum In-Stack Concentration (ppm): 0.08

MAGLC (ppm): 1.19

Pollutant: VM&P Naphtha



TLV (ppm): 300

Maximum Hourly Emission Rate (lbs/hr): 0.70

Predicted 1-Hour Maximum In-Stack Concentration (ppm): 0.24

MAGLC (ppm): 7.14

Pollutant: Methyl Propyl Ketone

TLV (ppm): 200

Maximum Hourly Emission Rate (lbs/hr): 0.01

Predicted 1-Hour Maximum In-Stack Concentration (ppm): 0.18

MAGLC (ppm): 4.76

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

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

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

(3) 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:"



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Preliminary Proposed Title V Permit

Permit Number: P0088832

Facility ID: 0575000095

Effective Date: To be entered upon final issuance

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

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.



3. K004, Chassis Paint Line

Operations, Property and/or Equipment Description:

Chassis Paint Line - Building #103

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) b)(1)f., g)(1), g)(2), and g)(3).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) and PTI: 05-13426	<p>Volatile Organic Compounds (VOC) emissions from this emission unit shall not exceed 14.2 lbs VOC/hour and 16.2 tons VOC per rolling 12-month period.</p> <p>VOC content of cleanup thinners shall not exceed 6.76 lbs VOC per gallon.</p>
b.	OAC rule 3745-31-05(D)	<p>Coating usage for this emission unit shall be limited to 8,580 gallons per rolling 12-month period.</p> <p>Cleanup Thinner usage for this emission unit shall not exceed 360 gallons per rolling 12-month period.</p>
c.	OAC rule 3745-21-09(U)(1)	VOC content of extreme performance coatings shall not exceed 3.5 lbs VOC per gallon, as applied minus water and exempt solvents.
d.	OAC rule 3745-17-07(A)	Visible Particulate Emissions (PE) shall not exceed 20% as a six-minute average, except as provided by rule.
e.	OAC rule 3745-17-11(B)	<p>PE shall not exceed 0.551 lb PE/hr</p> <p>b)(2)a. and b)(2)b.</p>
f.	OAC rule 3745-114-01	Air Toxic Policy
g.	OAC rule 3745-17-11(C)	b)(2)c.



(2) Additional Terms and Conditions

- a. The particulate matter emission limit is derived based on the equation noted with Table 1 from OAC Rule 3745-11. Figure II does not apply (per OAC rule 3745-17-11(A)(2)(a)(i)) because the uncontrolled mass rate of particulate emissions cannot be determined.
- b. This emissions limitation reflects the current State Implementation Plan (SIP) for Ohio approved by the U.S. EPA. Ohio EPA has requested that this emissions limitation be modified to reflect compliance with the requirements of OAC rule 3745-17-11(C), but the new requirements will not become federally enforceable until it is approved by U.S. EPA as revision to the Ohio SIP for particulate emissions.
- c. The permittee shall operate the filter system for the coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual, with any modifications deemed necessary by the permittee. The filter system shall be employed during all periods of coating application to control particulate emissions.

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system whenever the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall keep daily records of all times when the emissions unit was in operation without operating the dry filtration system.
- (2) The permittee shall keep monthly records of the following data for emission unit K004:
 - a. The name, identification number (if any), and VOC content (in lbs/gallon) for each coating employed in emission units K004;
 - b. The name, identification number (if any), and VOC content (in lbs/gallon) for each cleanup thinner employed in emission units K004. This requirement applies only to cleanup and dilution solvents with a VOC content greater than zero pounds per gallon;
 - c. The total coating usage for emissions unit K004, in gallons;
 - d. The total usage of cleanup thinner with a VOC content greater than zero pounds per gallon for emissions unit K004, in gallons;
 - e. The rolling 12-month usage of coatings for emissions unit K004, in gallons;
 - f. The rolling 12-month usage of cleanup thinner with a VOC content greater than zero pounds per gallon for emissions unit K004, in gallons; and,
 - g. The rolling 12-month emission of VOC from coatings and cleanup thinner with a VOC content greater than zero pounds per gallon for emissions unit K004, in tons. The calculation of VOC emissions shall be based on the following equation:



16.2 tons VOC = [sum of all coatings (CC x CV) + sum of all cleanup and/or dilution solvents (SC x SV)] / 2000 lbs/ton

where:

CC = VOC content of coating, in pounds per gallon

CV = Usage volume of coating, in gallons

SC = VOC content of cleanup and dilution solvent, in pounds per gallon

SV = Usage volume of cleanup and dilution solvent, in gallons

16.2 tons limitation was derived by calculating the worst case emissions as follows:

16.2 tons = [(3.5 lbs VOC/gallon * 8,580 gallons) + (6.76 lbs VOC/gallon * 360 gallons)] / 2000 lbs/ton.

- (3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the filter system with any modifications deemed necessary by the permittee during the time period in which the filter is utilized. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (4) The permittee shall conduct periodic inspections of the filter system to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee. The periodic inspections of the filter system shall be performed at a frequency that is based upon the recommendation of the manufacturer, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, the permittee shall conduct a comprehensive inspection of the filter system, not less than once each calendar year, while the emissions unit is shut down; and shall perform any needed maintenance and repair for the control device to ensure that it is operated in accordance with the manufacturer's recommendations.

The permittee shall document each inspection of the filter system by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection. These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (5) In the event that the filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the filter system shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain a record of those periods when the filter system is not operating in accordance with such requirements. These records shall be maintained at the facility for not less than five years from the date of completion and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.



e) Reporting Requirements

- (1) The permittee shall notify the Director (the Ohio EPA, Southwest District Office) in writing of any record showing operation of this emission unit without operation of the dry filtration system. These notifications shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Southwest District Office, Division of Air Pollution Control) within 30 days following the exceedance.
- (2) The permittee shall notify the Director (the Ohio EPA, Southwest District Office) in writing of any monthly record showing the use of noncomplying coatings and/or cleanup thinner material. These notifications shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Southwest District Office, Division of Air Pollution Control) within 30 days following the end of the calendar month.
- (3) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. the rolling, 12 month limitation upon coatings usage for emission unit K004 of 8,580 gallons.
 - b. the rolling, 12 month limitation upon usage of cleanup and dilution solvents with a VOC content greater than zero pounds per gallon for emission unit K004 of 360 gallons.
 - c. the rolling 12-month limitation on VOC emissions from emission unit K004 of 16.2 tons.

These quarterly deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- (4) The permittee shall include in the quarterly report any record of the date and length of time the filter system was not in service during coating application. The quarterly report shall be submitted by January 31st, April 30th, July 31st, and October 31st of each year to the Ohio EPA, Southwest District Office, Division of Air Pollution Control.

f) Testing Requirements

(1) Emission Limitations:

Volatile Organic Compounds (VOC) content of extreme performance coatings shall not exceed 3.5 lbs VOC per gallon as applied, minus water and exempt solvents.

Cleanup thinners with a VOC content greater than zero shall have a maximum VOC content of 6.76 lbs VOC per gallon.

Applicable compliance Method:

Formulation data or USEPA Method 24 shall be used to determine the VOC content of the coatings and cleanup thinners. The record keeping requirements contained in Section III.2. shall demonstrate that only materials with these VOC content limitations are applied.



(2) Emission Limitations:

Coating usage for this emission unit shall be limited to 8,580 gallons per rolling 12-month period

Cleanup Thinner usage for this emission unit shall not exceed 360 gallons per rolling 12-month period

Applicable Compliance Method:

The record keeping requirements contained in Section III.2. shall demonstrate that these material usage limits were not exceeded.

(3) Emission Limitation:

Visible Particulate Emissions (PE) shall not exceed 20% as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

(4) Emission Limitation:

PE shall not exceed 0.551 lb PE/hr

Applicable Compliance Method:

Compliance shall be demonstrated using Method 5, 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

- (1) The permit to install for this emissions unit (K004) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Naphtha

TLV for methyl n-propyl ketone (mg/m³): 704 mg/m³

Maximum Hourly Emission Rate (g/sec): 2.17

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 10,110

MAGLC (ug/m³): 16,761 ug/m³.



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

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

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

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

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



4. K006, Paint Spray Booth - Building 103

Operations, Property and/or Equipment Description:

Paint Spray Booth for window parts in Building 103

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) b)(1)e., g)(1), g)(2), and g)(3).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) Synthetic minor to avoid PSD and BAT, and PTI 05-14436	Total combined VOC from the coating and cleanup operations shall not exceed 6.77 tons per rolling, 12-month period for emissions unit K006. The VOC content of liquid organic cleanup materials employed in this emissions unit shall not exceed 3.04 lbs/gallon. c)(1) and c)(2).
b.	OAC Rule 3745-21-09(U)	The VOC content of the coating materials employed in this emissions unit shall not exceed 3.5 lbs/gallon excluding water and exempt solvents.
c.	OAC rule 3745-31-05(A)(3)(b)	b)(2)a.
d.	OAC rule 3745-17-11(B)	PE shall not exceed 0.551 lb PE/hr b)(2)b. and b)(2)c.
e.	OAC rule 3745-114-01	Ohio Toxics Policy
f.	OAC rule 3745-17-11(C)	b)(2)d.

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) requirement under OAC rule 3745-31-05(A)(3) do not apply to the organic compound (OC), volatile organic compound (VOC) and particulate emissions (PE) from this emissions unit since the potential emissions are less than ten tons per year.



- b. The particulate matter emission limit is derived based on the equation noted with Table 1 from OAC Rule 3745-11. Figure II does not apply (per OAC rule 3745-17-11(A)(2)(a)(i)) because the uncontrolled mass rate of particulate emissions cannot be determined.
 - c. This emissions limitation reflects the current State Implementation Plan (SIP) for Ohio approved by the U.S. EPA. Ohio EPA has requested that this emissions limitation be modified to reflect compliance with the requirements of OAC rule 3745-17-11(C), but the new requirements will not become federally enforceable until it is approved by U.S. EPA as revision to the Ohio SIP for particulate emissions.
 - d. The permittee shall operate the filter system for the coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual, with any modifications deemed necessary by the permittee. The filter system shall be employed during all periods of coating application to control particulate emissions.
- c) Operational Restrictions
- (1) The maximum annual coating usage shall not exceed 3,000 gallons per rolling, 12-month period excluding water and exempt solvents for emissions unit K006.
 - (2) The maximum annual cleaning solvent usage shall not exceed 1,000 gallons per rolling, 12-month period for emissions unit K006.
- d) Monitoring and/or Recordkeeping Requirements
- (1) This facility shall maintain the following monthly records on all coatings employed in emissions unit K006:
 - a. the name of the coating employed;
 - b. the volatile organic compound content, in lbs/gallon excluding water and exempt solvents;
 - c. the amount of coating employed, in gallons;
 - d. the 12-month rolling total amount of coatings employed, in gallons per last 12-month period;
 - e. the VOC emission of all coatings employed, in tons per month; and
 - f. the 12-month rolling total amount of VOC emitted from the use of coatings, in tons per last 12-month period.
 - (2) This facility shall maintain the following monthly records on all cleanup material employed in emissions unit K006:
 - a. the name of the material employed;
 - b. the volatile organic compound content, in lbs/gallon;



- c. the amount of material employed, in gallons;
 - d. the 12-month rolling total amount of cleanup materials employed, in gallons per last 12-month period;
 - e. the VOC emission of all cleanup materials, in tons per month; and
 - f. the 12-month rolling total amount of VOC emitted from the use of cleanup materials, in tons per last 12-month period.
- (3) This facility shall maintain the following monthly records on all coating and cleanup material employed in emissions unit K006:
- a. the combined monthly VOC emissions for coating and cleanup materials employed, in tons per month; and
 - b. the combined 12-month rolling total amount of VOC emitted from the use of coating and cleanup materials, in tons per last 12-month period.
- (4) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the filter system with any modifications deemed necessary by the permittee during the time period in which the filter is utilized. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (5) The permittee shall conduct periodic inspections of the filter system to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee. The periodic inspections of the filter system shall be performed at a frequency that is based upon the recommendation of the manufacturer, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, the permittee shall conduct a comprehensive inspection of the filter system, not less than once each calendar year, while the emissions unit is shut down; and shall perform any needed maintenance and repair for the control device to ensure that it is operated in accordance with the manufacturer's recommendations.

The permittee shall document each inspection of the filter system by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection. These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (6) In the event that the filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the filter system shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain a record of those periods when the filter system is not operating in accordance with such requirements. These records shall be maintained at the facility for not less than five years from the date of completion and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.



e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation reports that identify the following:
 - a. all exceedances of the rolling, 12-month period coating usage limitation of 3,000 gallons excluding water and exempt solvents;
 - b. all exceedances of coating VOC content of 3.5 lbs/gal;
 - c. all exceedances of the rolling, 12-month period cleaning solvent usage limitation of 1,000 gallons;
 - d. all exceedances of liquid clean up VOC content of 3.04 lbs/gal; and/or
 - e. all exceedances of the rolling, 12-month period VOC emission limitation of 6.77 tons for emissions unit K006.

These quarterly deviation reports are due by the dates specified in the General Terms and Conditions of this permit.

- (2) The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.
- (3) The permittee shall include in the quarterly report any record of the date and length of time the filter system was not in service during coating application. The quarterly report shall be submitted in accordance with the General Terms and Conditions of this permit to the Ohio EPA, Southwest District Office, Division of Air Pollution Control

f) Testing Requirements

- (1) Compliance with the emission limitation in Section A. I. 1. of these terms and conditions shall be determined in accordance with the following method:

a. Emission Limitation:

6.77 tons of VOC per rolling, 12-month period for emissions unit K006.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Sections A.III.1.(e) and A.III.2.(e). of these T&C's.

Formulation data or Method 24 of 40 CFR, Part 60, Appendix A, shall be used to determine the organic compound contents of the materials employed.

b. Emission Limitation:

The VOC content of the coating materials employed in this emissions unit shall not exceed 3.5 lbs/gallon, as applied.



The VOC content of liquid organic cleanup materials employed in this emissions unit shall not exceed 3.04 lbs/gallon, as applied.

Applicable Compliance Method:

Formulation data or Method 24 of 40 CFR, Part 60, Appendix A, shall be used to demonstrate compliance with the organic compound content limitations.

g) Miscellaneous Requirements

- (1) The permit to install for this emissions unit 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 for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration 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 for the "worst case" pollutant(s):

Pollutant: Butyl Acetate

TLV (ppm): 200

Maximum Hourly Emission Rate (g/s): 0.4817

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 424.9

MAGLC (ug/m3): 22,623.4

Pollutant: Toluene

TLV (ppm): 50

Maximum Hourly Emission Rate (g/s): 0.0832

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 73.39

MAGLC (ug/m3): 4,485.8

Pollutant: Xylene

TLV (ppm): 100

Maximum Hourly Emission Rate (g/s): 0.0671

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 54.51

MAGLC (ug/m3): 10,337.9

- (2) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not



the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

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

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



5. P002, Wood Shop/Bldg.102

Operations, Property and/or Equipment Description:

Woodworking operations (sanders, saws, planers), Bldg. 102

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(B)(2)	2.40 lbs of particulate emissions (PE)/hour.
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the cyclone associated with 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 location and 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.

e) 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 cyclone associated with 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 Ohio EPA, Southwest District Office, Division of Air Pollution Control) by January 31 and July 31 of each year and shall cover the previous 6-month period.

f) Testing Requirements

(1) Compliance with the emission limitations of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation-

2.40 lbs PE/hr

Applicable Compliance Method:

To determine the actual worst case emissions rate for PE, the following equation (from AP-42, Table 10.3-1) may be used:

$$E = MPWR \times EF$$

E = the maximum PE rate (lbs/hr)

MPWR = the maximum square footage of the material cut, sanded, shaped, etc.

EF = emission factor (0.1 lb PE/sq.ft. of material)

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

b. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the visible emissions limitation above shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

g) Miscellaneous Requirements

(1) None.



6. P004, Paint Stripping Area in Bldg. #103

Operations, Property and/or Equipment Description:

Stripping of paint from trailers, Bldg. 103

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) b)(1)d., g)(1), g)(2), and g)(3).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) and PTI: 05-14423	<p>The OC content of the paint stripping materials employed in this emissions unit shall not exceed 10.0 lbs/gallon, as applied.</p> <p>The OC content of liquid organic cleanup materials employed in this emissions unit shall not exceed 6.57 lbs/gallon, as applied.</p> <p>The use of any photochemically reactive material in this emissions unit, as defined in OAC rule 3745-21-01(C)(5), is prohibited.</p> <p>The requirements of this rule also include compliance with the requirements in OAC rule 3745-21-07(G) and 3745-31-05(C).</p>
b.	OAC rule 3745-31-05(D) Synthetic minor to avoid PSD	Total combined OC from the stripping and cleanup operations shall not exceed 6.23 tons per rolling, 12-month period for emissions unit P004
c.	OAC Rule 3745-21-07(G)	b)(2)a.
d.	OAC rule 3745-114-01	Ohio Toxic Policy

(2) Additional Terms and Conditions

a. The prohibition of the use of photochemically reactive material reflects a requirement established to exempt this emissions unit from the current Ohio SIP approved by the U.S. EPA. Ohio has requested that this part of the the SIP be



modified to no longer have applicable limits for emissions units like this one, but the new requirements will not become federally enforceable until it is approved by the U.S. EPA as a revision to the Ohio SIP for organic compound emissions. When approved by the U.S. EPA, the prohibition of the use of photochemically reactive materials and OAC rule 3745-21-07(G)(2) shall no longer apply.

- b. After the rule is added to the Ohio SIP, the emission limitations, monitoring, record keeping, and reporting requirements related to these hourly and daily limitations included in sections A.III.1.(f), A.III.2.(f), and A.IV.2. shall be void.
- c) Operational Restrictions
 - (1) The maximum annual cleaning solvent usage shall not exceed 1,000 gallons per rolling, 12-month period for emissions unit P004.
 - (2) The maximum annual brushable stripper usage shall not exceed 400 gallons per rolling, 12-month period for emissions unit P004.
 - (3) The maximum annual aircraft paint remover usage shall not exceed 200 gallons per rolling, 12-month period for emissions unit P004.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) This facility shall maintain the following monthly records on all strippers employed in emissions unit P004:
 - a. the name of the coating employed;
 - b. the amount of coating employed, in gallons;
 - c. the organic compound content, in lbs/gallon;
 - d. the OC emission of all coatings employed, in tons per month;
 - e. the 12-month rolling total amount of OC emitted from the use of coatings, in tons per last 12-month period; and
 - f. verification that material used is not photochemically reactive.
 - (2) The permittee shall collect and record the following information each month on the cleanup materials in emissions unit P004:
 - a. the name of the material employed;
 - b. the amount of material employed, in gallons;
 - c. the organic compound content, in lbs/gallon;
 - d. the OC emission of all cleanup materials, in tons per month;
 - e. the 12-month rolling total amount of OC emitted from the use of cleanup materials, in tons per last 12-month period; and



f. verification that material used is not photochemically reactive.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation reports that identify the following:

- a. all exceedances of the rolling, 12-month period cleaning solvent usage limitation of 1,000 gallons;
- b. all exceedances of liquid cleanup OC content of 6.57 lbs/gal;
- c. all exceedances of the rolling, 12-month period brushable stripper usage limitation of 400 gallons;
- d. all exceedances of the rolling, 12-month period aircraft paint remover usage limitation of 200 gallons;
- e. all exceedances of paint stripper OC content of 10 lbs/gal; and/or
- f. all exceedances of the rolling, 12-month period OC emission limitation of 6.23 tons for emissions unit P004.

These quarterly deviation reports are due by the dates specified in the General Terms and Conditions of this permit.

(2) The permittee shall notify the Director, in writing, of any monthly record showing the use of noncompliant materials, i.e., photochemically reactive materials. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Southwest District Office, Division of Air Pollution Control within 30 days following the end of the calendar month during which the noncompliance occurred.

f) Testing Requirements

(1) Compliance with the emission limitations of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

6.23 tons of OC per rolling, 12-month period for emissions unit P004.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements d)(1)e. and d)(2)e.

Formulation data or Method 24 of 40 CFR, Part 60, Appendix A, shall be used to determine the organic compound contents of the materials employed.

b. Emission Limitation:

The OC content of the paint stripping materials employed in this emissions unit shall not exceed 10.0 lbs/gallon, as applied.



The OC content of liquid organic cleanup materials employed in this emissions unit shall not exceed 6.57 lbs/gallon, as applied.

Applicable Compliance Method:

Formulation data or Method 24 of 40 CFR, Part 60, Appendix A, shall be used to demonstrate compliance with the organic compound content limitations.

g) Miscellaneous Requirements

- (1) The permit to install for this emissions unit 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 for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration 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 for the "worst case" pollutant(s):

Pollutant: Methylene Chloride

TLV (ppm): 50

Maximum Hourly Emission Rate (g/s): 0.323

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 140.3

MAGLC (ug/m3): 4135.2

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



- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

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



7. R001, Glue Spray Booth - Building 102

Operations, Property and/or Equipment Description:

Glue Spray Booth - Spray-on Contact Adhesive - Building 102

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) b)(1)c.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(B)	PE shall not exceed 0.551 lb PE/hr b)(2)b. and b)(2)c.
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-11(C)	b)(2)d.

(2) Additional Terms and Conditions

a. The facility is not located in a "Priority I" county as defined in OAC rule 3745-21-06, and the emissions unit is not a new source. Therefore, pursuant to OAC rule 3745-21-07(A), this emissions unit is exempt from the requirements of OAC rule 3745-21-07(G).

b. The particulate matter emission limit is derived based on the equation noted with Table 1 from OAC Rule 3745-11. Figure II does not apply (per OAC rule 3745-17-11(A)(2)(a)(i)) because the uncontrolled mass rate of particulate emissions cannot be determined.

c. This emissions limitation reflects the current State Implementation Plan (SIP) for Ohio approved by the U.S. EPA. Ohio EPA has requested that this emissions limitation be modified to reflect compliance with the requirements of OAC rule 3745-17-11(C), but the new requirements will not become federally enforceable until it is approved by U.S. EPA as revision to the Ohio SIP for particulate emissions.

d. The permittee shall operate the filter system for the coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual, with any modifications deemed necessary by the permittee.



The filter system shall be employed during all periods of coating application to control particulate emissions.

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
- (2) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the filter system with any modifications deemed necessary by the permittee during the time period in which the filter is utilized. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (3) The permittee shall conduct periodic inspections of the filter system to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee. The periodic inspections of the filter system shall be performed at a frequency that is based upon the recommendation of the manufacturer, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, the permittee shall conduct a comprehensive inspection of the filter system, not less than once each calendar year, while the emissions unit is shut down; and shall perform any needed maintenance and repair for the control device to ensure that it is operated in accordance with the manufacturer's recommendations.

The permittee shall document each inspection of the filter system by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection. These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (4) In the event that the filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the filter system shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain a record of those periods when the filter system is not operating in accordance with such requirements. These records shall be maintained at the facility for not less than five years from the date of completion and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

e) Reporting Requirements

- (1) The permittee shall notify the Director (the Ohio EPA, Southwest District Office, Division of Air Pollution Control) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification



shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Southwest District Office, Division of Air Pollution Control) within 30 days after the event occurs.

- (2) The permittee shall include in the quarterly report any record of the date and length of time the filter system was not in service during coating application. The quarterly report shall be submitted in accordance with the General Terms and Conditions of this permit to the Ohio EPA, Southwest District Office, Division of Air Pollution Control.

f) Testing Requirements

- (1) Compliance with the emission limitation in Section A.I.1. of these terms and conditions shall be determined in accordance with the following method:

- a. Emission Limitation:

0.551 lb PE/hr

Applicable Compliance Method:

To determine the actual worst case emissions rate for PE, the following equation may be used:

$$E = MCSUR \times (1 - TE) \times (1 - CE)$$

where:

E = PE rate (lbs/hr)

MCSUR = the maximum coating solids usage rate (lbs/hr)

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

CE = control efficiency of the control equipment.

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

- b. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the visible emissions limitation above shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

g) Miscellaneous Requirements

- (1) None.