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

7/29/2008

Certified Mail

Yes	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
Yes	MODELING SUBMITTED

ANNETTE EHRHORN-WILLEMAN
Three Bond International, Inc.
6184 Schumacher Park Drive
West Chester, OH 45069

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0857103289
Permit Number: P0093492
Permit Type: Renewal
County: Montgomery

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Dayton Daily News. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control 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 draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and

Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install and operate will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install and Operate is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Regional Air Pollution Control Agency at (937)225-4435.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
RAPCA; Indiana; Kentucky

Montgomery County

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
Three Bond International, Inc.

Issue Date: 7/29/2008
Permit Number: P0093492
Permit Type: Renewal
Permit Description: coaters
Facility ID: 0857103289
Facility Location: Three Bond International, Inc.
101 DARUMA PKWY,
Moraine, OH 45439

Facility Description: Metal Coating, Engraving (except Jewelry and Silverware), and Allied Services to Manufacturers

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Carlos Lynch at Regional Air Pollution Control Agency, 117 South Main Street or (937)225-4435. The permit can be downloaded from the Web page: www.epa.state.oh.us/dapc

Permit Strategy Write-Up

1. Check all that apply:

   _x_ Synthetic Minor Determination

   ___ Netting Determination

2. Source Description:
   Three bond International, Inc. is an international adhesives and sealants manufacturer, the major equipment to be installed includes five dip-tank coating machines, one automated coating machine, one rotary coating machine and one tumbling coating process. The potential emissions of single HAP and total HAP from this project would be greater than 10 and 25 TPY, respectively, making this plant a Major HAP facility. The permittee wants to limit the VOC, single HAP and total HAP emissions below the major threshold (10 and 25 TPY). Therefore, through the limitation of the VOC, single and total HAP emissions, they will be a synthetic minor facility and avoid Title V permitting and 40 CFR Part 63, Subpart MMMM and PPPP.

3. Facility Emissions and Attainment Status:
   The facility is located in Moraine City (Montgomery county is currently designated as non-attainment for ozone). The facility has eight permitted sources. Without synthetic minor restrictions the facility is a major source for single and total HAPs.

4. Source Emissions:
   The potential emissions of single HAP and total HAP from this facility without any federally enforceable restrictions is greater than 10 and 25 TPY, respectively. Three Bond International, Inc. is potentially a major source of HAPs emissions as defined by Title V permitting requirements, as a result USEPA's National Emission Standard for Hazardous Air Pollutants (NESHAP) for Miscellaneous Metal Part and Products (MMMM) and Plastic Parts and Products (PPPP) are potentially applicable. The permittee is seeking to restrict the PTE of the emission unit at this facility by proposing a synthetic minor HAP limitation of 9.9 TPY for single HAPs and 24.9 TPY for total HAPs be applied to the entire facility.

5. Conclusion:
   Three Bond International, Inc will be a synthetic minor facility by limiting the VOC, single HAPs and combined HAP to below Title V permitting threshold levels. Monthly monitoring, record keeping and reporting requirements will be required to ensure compliance. Therefore, through federally enforceable terms and conditions, Three Bond International, Inc will not trigger Title V and NESHAP permitting requirements.

Please provide additional notes or comments as necessary:

None

Summary (for informational purposes only):
Total Permit Allowable Emissions

Pollutant	Tons Per Year
VOC	43.71
Single HAP	9.9
Combined HAPs	24.9

State of Ohio Environmental Protection Agency

Division of Air Pollution Control

DRAFT

Air Pollution Permit-to-Install and Operate

for

Three Bond International, Inc.

Facility ID:	0857103289
Permit Number:	P0093492
Permit Type:	Renewal
Issued:	7/29/2008
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 Permit-to-Install and Operate
for
Three Bond International, Inc.

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Authorization

Facility ID: 0857103289
Application Number(s): A0024966
Permit Number: P0093492
Permit Description: coaters
Permit Type: Renewal
Permit Fee: $0.00 *DO NOT send payment at this time - subject to change before final issuance*
Issue Date: 7/29/2008
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Three Bond International, Inc.
101 DARUMA PKWY
Moraine, OH 45439

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

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

Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280
(937)225-4435

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Authorization (continued)

Permit Number: P0093492
Permit Description: coaters

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	**K008**
Company Equipment ID:	Dip coater #8
Superseded Permit Number:	08-04778
General Permit Category and Type:	Not Applicable

Group Name: automatic coater

Emissions Unit ID:	**K006**
Company Equipment ID:	Dip coater #6
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K007**
Company Equipment ID:	Dip coater #7
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: dip coaters

Emissions Unit ID:	**K001**
Company Equipment ID:	K001-Dip coater # 1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K002**
Company Equipment ID:	Dip coater #2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K003**
Company Equipment ID:	Dip coater #3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K004**
Company Equipment ID:	Dip coater #4
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K005**
Company Equipment ID:	Dip coater #5
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. **What does this permit-to-install and operate ("PTIO") allow me to do?**

   This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. **Who is responsible for complying with this permit?**

   The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

   The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. **What records must I keep under this permit?**

   You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. **What are my permit fees and when do I pay them?**

   There are two fees associated with permitted air contaminant sources in Ohio:

   - PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

     You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

   - Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. **When does my PTIO expire, and when do I need to submit my renewal application?**

   This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Regional Air Pollution Control Agency in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit 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.
You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

   a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

      (1) None.

   b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

      (1) None.

C. Emissions Unit Terms and Conditions

1. K008, Dip coater #8

Operations, Property and/or Equipment Description:

K008-Tumbling Process 1

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. d)(4) through d)(6).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)c and b)(2)b., d)(1) through d)(3), e)(1) through e)(3), f)(1).

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)	The Volatile Organic Compound (VOC) emissions from this emissions unit shall not exceed 18.69 lbs/hr excluding cleanup. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D) and, OAC rule 3745-21-09(U)(2)(e)(i).
b.	OAC rule 3745-21-09(U)(2)(e)(i)	The permittee shall not use more than 8 gallons of coating material per day for the coating of miscellaneous metal parts.
c	OAC rule 3745-31-05(D) (synthetic minor to avoid Title V and MACT applicability)	The VOC emissions from emissions unit K001, K002, K003, K004, K005, K006, K007 and K008 shall not exceed 43.71 tons per year (TPY) as

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		a rolling 12-month summation, including both coatings and cleanup materials. The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 tons/year for any single HAP and 24.9 tons/year for any combination of HAPs, per rolling 12 month summations. See b)(2)b.

(2) Additional Terms and Conditions

a. The pound/hr emission limit was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

b. The VOC usage rate from emissions units K001, K002, K003, K004, K005, K006, K007 and K008 shall not exceed 43.71 tons per year, based upon a rolling, 12-month summation of the monthly usage rates.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage levels specified in the following table:)

Month(s	Maximum Allowable Cumulative Usage Rate of VOC (tons)
1	10
2	20
3	30
4	40
5	43.71
6	43.41
7	43.71
8	43.71

9	43.71
10	43.71
11	43.71
12	43.71

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual usage rate limitation for VOC shall be based upon a rolling, 12-month summation of the monthly VOC usage rates.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each day for the coating line.

a. The name and identification number of each coating employed.

b. The volume, in gallons of each coating employed.

c. The total volume, in gallons, of all the coatings employed.

(2) The permittee shall collect and record each month the following information for emissions units (K001 through K008):

a. The name and identification of each coating and cleanup material employed.

b. The volume in gallons of each coating and cleanup material employed.

c. The VOC content of each coating and cleanup material employed, in pounds per gallon.

d. The total VOC emissions from all cleanup materials employed, [i.e., summation of d)(2)b. x d)(2)c. for each cleanup material employed], in pounds per month.

e. The amount of cleanup material recovered, in pounds of VOC.

f. The total VOC emissions from cleanup operations, in pounds [i.e., d)(2)d. – d)(2)e.]

g. The total VOC emissions from all coating employed, in pounds, [i.e., summation of d)(2)b. x d)(2)c. for each coating employed].

h. The total VOC emissions from coating and cleanup materials in tons.

i. The rolling, 12-month summation of the monthly VOC emissions and usages* in tons.

*this is based upon the premise that 100% of the VOC usage is emitted as VOC emissions.

(3) The permittee shall collect and record each month the following information for the entire facility:

a. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating material, in pounds of individual HAP per gallon, as applied.

b. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.

c. The total combined HAP content of each coating material, in pounds of combined HAPs per gallon, as applied (the sum of all the individual HAP contents from d)(3)a.).

d. The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (the sum of all the individual HAP contents from Section d)(3)b.).

e. The total individual HAP emission rate for all the coatings and cleanup materials employed, in tons.

f. The total combined HAP emission rate for all the coatings and cleanup materials employed, in tons.

g. The rolling, 12- month total individual HAP emission rate for each HAP employed, in tons.

h. The rolling, 12-month total combined HAPs emission rate for all the HAPs employed, in tons.

*A listing of the HAPs can be found in Section 112 (b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. This information does not have to be kept on a line-by-line basis.

(4) The permit to install for these eight emissions units (K001 through K008) 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. Using the SCREEN 3.0 model and comparing 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 "worst case" pollutant:

Pollutant: Toulene

TLV (mg/m3): 188

Maximum Hourly Emission Rate: 38.24 lbs/hour

Predicted 1-Hour Maximum Ground-Level

Concentration at the Fenceline (ug/m3): 3198

MAGLC (ug/m3): 4485

(5) 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 previously modeled;

b. changes in the composition of the materials used, 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.).

(6) If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change..

e) Reporting Requirements

(1) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage restriction of 8 gallons. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 45 days after the exceedance occurs.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

The VOC emissions from emissions unit K001, K002, K003, K004, K005, K006, K007 and K008 shall not exceed 43.71 tons per year (TPY) as a rolling 12-month summation, including both coatings and cleanup materials.

The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 tons/year for any single HAP and 24.9 tons/year for any combination of HAPs, per rolling 12 month summations.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the director (the appropriate district office or local air agency).

(3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

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

a. Emission Limitation:

The permittee shall not use more than 8 gallons of coating material per day for the coating of miscellaneous metal parts.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(1)c.

b. Emissions Limitation:

The VOC emissions and usages from emissions unit K001, K002, K003, K004, K005, K006, K007 and K008 shall not exceed 43.71 tons per year (TPY) as a rolling 12-month summation, including both coatings and cleanup materials.

Applicable compliance Method:

Compliance shall be based upon the record keeping specified in d)(2)i.

c. Emission Limitation-

The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 tons/year for any single HAP and 24.9 tons/year for any combination of HAPs, per rolling 12 month summations.

Applicable Compliance Method-

Compliance with the annual allowable individual HAP and combined HAP emission limitation above shall be based upon the record keeping requirements specified in d)(3)g. and d)(3)h. respectively..

g) Miscellaneous Requirements

(1) None.

2. Emissions Unit Group - automatic coater: K006, K007,

EU ID	Operations, Property and/or Equipment Description
K006	Automated Coater 1
K007	Rotary Coater 1

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. d)(4) through d)(6).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)c and b)(2)b., d)(1) through d)(3), e)(1) through e)(3), f)(1) and f)(2).

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)	The Volatile Organic Compound (VOC) emissions from this emissions unit shall not exceed 9.23 lbs/hr excluding cleanup. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D) and OAC rule 3745-21-09(U)(2)(e)(i).
b.	OAC rule 3745-21-09(U)(2)(e)(i)	The permittee shall not use more than 8 gallons of coating material per day for the coating of miscellaneous metal parts.
c	OAC rule 3745-31-05(D) (synthetic minor to avoid Title V and MACT applicability)	The VOC emissions from emissions unit K001, K002, K003, K004, K005, K006, K007 and K008 shall not

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		exceed 43.71 tons per year (TPY) as a rolling 12-month summation, including both coatings and cleanup materials. The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 tons/year for any single HAP and 24.9 tons/year for any combination of HAPs, per rolling 12 month summations. See b)(2)b.

(2) Additional Terms and Conditions

a. The pound/hr emission limit was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

b. The VOC usage rate from emissions units K001, K002, K003, K004, K005, K006, K007 and K008 shall not exceed 43.71 tons per year, based upon a rolling, 12-month summation of the monthly usage rates.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage levels specified in the following table:

Month(s	Maximum Allowable Cumulative Usage Rate of VOC (tons)
1	10
2	20
3	30
4	40
5	43.71
6	43.41
7	43.71

8	43.71
9	43.71
10	43.71
11	43.71
12	43.71

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual usage rate limitation for VOC shall be based upon a rolling, 12-month summation of the monthly VOC usage rates.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each day for the coating line.

a. The name and identification number of each coating employed.

b. The volume, in gallons of each coating employed.

c. The total volume, in gallons, of all the coatings employed.

(2) The permittee shall collect and record each month the following information for emissions units (K001 through K008):

a. The name and identification of each coating and cleanup material employed.

b. The volume in gallons of each coating and cleanup material employed.

c. The VOC content of each coating and cleanup material employed, in pounds per gallon.

d. The total VOC emissions from all cleanup materials employed, [i.e., summation of d)(2)b. x d)(2)c. for each cleanup material employed], in pounds per month.

e. The amount of cleanup material recovered, in pounds of VOC.

f. The total VOC emissions from cleanup operations, in pounds [i.e., d)(2)d. – d)(2)e.]

g. The total VOC emissions from all coating employed, in pounds, [i.e., summation of d)(2)b. x d)(2)c. for each coating employed].

h. The total VOC emissions from coating and cleanup materials in tons.

i. The rolling, 12-month summation of the monthly VOC emissions and usages* in tons.

*this is based upon the premise that 100% of the VOC usage is emitted as VOC emissions.

(3) The permittee shall collect and record each month the following information for the entire facility:

a. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating material, in pounds of individual HAP per gallon, as applied.

b. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.

c. The total combined HAP content of each coating material, in pounds of combined HAPs per gallon, as applied (the sum of all the individual HAP contents from d)(3)a.).

d. The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (the sum of all the individual HAP contents from Section d)(3)b.).

e. The total individual HAP emission rate for all the coatings and cleanup materials employed, in tons.

f. The total combined HAP emission rate for all the coatings and cleanup materials employed, in tons.

g. The rolling, 12- month total individual HAP emission rate for each HAP employed, in tons.

h. The rolling, 12-month total combined HAPs emission rate for all the HAPs employed, in tons.

*A listing of the HAPs can be found in Section 112 (b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. This information does not have to be kept on a line-by-line basis.

(4) The permit to install for these eight emissions units (K001 through K008) 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. Using the SCREEN 3.0 model and comparing 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 "worst case" pollutant:

Pollutant: Toulene

TLV (mg/m3): 188

Maximum Hourly Emission Rate: 38.24 lbs/hour

Predicted 1-Hour Maximum Ground-Level

Concentration at the Fenceline (ug/m3): 3198

MAGLC (ug/m3): 4485

(5) 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 he "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 previously modeled;

b. changes in the composition of the materials used, 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.).

(6) If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.

e) Reporting Requirements

(1) The permittee shall notify the Director (appropriate District Office or local air agency) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage restriction of 8 gallons. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 45 days after the exceedance occurs.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

The VOC emissions from emissions unit K001, K002, K003, K004, K005, K006, K007 and K008 shall not exceed 43.71 tons per year (TPY) as a rolling 12-month summation, including both coatings and cleanup materials.

The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 tons/year for any single HAP and 24.9 tons/year for any combination of HAPs, per rolling 12 month summations.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the director (the appropriate district office or local air agency).

(3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

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

a. Emission Limitation:

The permittee shall not use more than 8 gallons of coating material per day for the coating of miscellaneous metal parts.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(1)c.

b. Emissions Limitation:

The VOC emissions and usages from emissions unit K001, K002, K003, K004, K005, K006, K007 and K008 shall not exceed 43.71 tons per year (TPY) as a rolling 12-month summation, including both coatings and cleanup materials.

Applicable compliance Method:

Compliance shall be based upon the record keeping specified in d)(2)i.

c. Emission Limitation-

The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 tons/year for any single HAP and 24.9 tons/year for any combination of HAPs, per rolling 12 month summations.

Applicable Compliance Method-

Compliance with the annual allowable individual HAP and combined HAP emission limitation above shall be based upon the record keeping requirements specified in d)(3)g. and d)(3)h. respectively.

g) Miscellaneous Requirements

(1) None.

3. Emissions Unit Group - dip coaters: K001, K002, K003, K004, K005,

EU ID	Operations, Property and/or Equipment Description
K001	Dip Coater 1
K002	Dip Coater 2
K003	Dip Coater 3
K004	Dip Coater 4
K005	Dip Coater 5

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. d)(4) through d)(6).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)c, b)(2)a. and b)(2)c., d)(1) through d)(3), e)(1) through e)(3), f)(1) and f)(2).

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)	The Volatile Organic Compound (VOC) emissions from this emissions unit shall not exceed 18.69 lbs/hr excluding cleanup. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D) and OAC rule 3745-21-09(U)(2)(e)(i) and OAC rule 3745-21-07(G)(2).
b.	OAC rule 3745-21-09(U)(2)(e)(i)	The permittee shall not use more than 8 gallons of coating material per day for the coating of miscellaneous metal parts.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c	OAC rule 3745-21-07(G)(2)	On the days when coating nonmetal parts the organic compound (OC) emissions from this emissions unit shall not exceed 8 pounds per hour and 40 pounds per day. See b)(2)a.
d	OAC rule 3745-31-05(D) (synthetic minor to avoid Title V and MACT applicability)	The VOC emissions from emissions unit K001, K002, K003, K004, K005, K006, K007 and K008 shall not exceed 43.71 tons per year (TPY) as a rolling 12-month summation, including both coatings and cleanup materials. The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 tons/year for any single HAP and 24.9 tons/year for any combination of HAPs, per rolling 12 month summations. See b)(2)c.

(2) Additional Terms and Conditions

a. All the coatings and cleanup materials employed (when coating nonmetal parts) in this emissions unit are photochemically reactive materials. Therefore, no record keeping requirements are necessary to document whether the coatings and/or cleanup materials are photochemically reactive materials.

The OC emission limitations of 8 pounds per hour and 40 pounds per day when photochemically reactive coatings or clean up materials are employed shall cease to be effective and federally enforceable on the date the U.S. EPA approves the revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, the emission limitations, monitoring, record keeping, reporting and testing requirements related to these hourly and daily limitations included in d)(1)e, f, g and h, e)(2)a and b, f)(1)b shall be void.

b. The pound/hr emission limit was established for PTI purposes to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

c. The VOC usage rate from emissions units K001, K002, K003, K004, K005, K006, K007 and K008 shall not exceed 43.71 tons per year, based upon a rolling, 12-month summation of the monthly usage rates.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the usage levels specified in the following table:

Month(s	Maximum Allowable Cumulative Usage Rate of VOC (tons)
1	10
2	20
3	30
4	40
5	43.71
6	43.41
7	43.71
8	43.71
9	43.71
10	43.71
11	43.71
12	43.71

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual usage rate limitation for VOC shall be based upon a rolling, 12-month summation of the monthly VOC usage rates.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each day for this emissions unit.

a. The name and identification of each coating employed (including whether it is used for metal or nonmetal parts) and cleanup material employed.

b. The volume, in gallons of each coating employed.

c. On the days when coating metal parts, the total volume, in gallons, of all the coatings employed for the coating of metal parts.

d. The volume, in gallons of each cleanup material employed.

e. The OC content of each coating and cleanup material employed, in pounds per gallon.

f. The total OC emissions rate for all coating and cleanup materials employed, (when coating nonmetal parts) [i.e., summation of d)(2)b. x d)(2)e. for all coatings plus d)(2)d. x d)(2)e. for all cleanup materials], in pounds.

g. The total numbers of hours the emissions unit was in operation (when coating nonmetal parts).

h. The average hourly OC emissions rate for all coatings and cleanup materials, i.e., d)(2)f./d)(2)g., in pounds per hour (average) (when coating nonmetal parts).

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, d)(1)a. the following phrase: "and cleanup material employed" and d)(1)d, e, f, g and h, shall be voided].

(2) The permittee shall collect and record each month the following information for emissions units (K001 through K008):

a. The name and identification of each coating and cleanup material employed.

b. The volume in gallons of each coating and cleanup material employed.

c. The VOC content of each coating and cleanup material employed, in pounds per gallon.

d. The total VOC emissions from all cleanup materials employed, [i.e., summation of d)(2)b. x d)(2)c. for each cleanup material employed], in pounds per month.

e. The amount of cleanup material recovered, in pounds of VOC.

f. The total VOC emissions from cleanup operations, in pounds [i.e., d)(2)d. – d)(2)e.]

g. The total VOC emissions from all coating employed, in pounds, [i.e., summation of d)(2)b. x d)(2)c. for each coating employed].

h. The total VOC emissions from coating and cleanup materials in tons.

i. The rolling, 12-month summation of the monthly VOC emissions and usages* in tons.

*this is based upon the premise that 100% of the VOC usage is emitted as VOC emissions.

(3) The permittee shall collect and record each month the following information for the entire facility:

a. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating material, in pounds of individual HAP per gallon, as applied.

b. The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied.

c. The total combined HAP content of each coating material, in pounds of combined HAPs per gallon, as applied (the sum of all the individual HAP contents from d)(2)a.).

d. The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (the sum of all the individual HAP contents from Section d)(2)b.).

e. The total individual HAP emission rate for all the coatings and cleanup materials employed, in tons.

f. The total combined HAP emission rate for all the coatings and cleanup materials employed, in tons.

g. The rolling, 12- month total individual HAP emission rate for each HAP employed, in tons.

h. The rolling, 12-month total combined HAPs emission rate for all the HAPs employed, in tons.

*A listing of the HAPs can be found in Section 112 (b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. This information does not have to be kept on a line-by-line basis.

(4) The permit to install for these eight emissions units (K001 through K008) 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. Using the SCREEN 3.0 model and comparing 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 "worst case" pollutant:

Pollutant: Toulene

TLV (mg/m3): 188

Maximum Hourly Emission Rate: 38.24 lbs/hour

Predicted 1-Hour Maximum Ground-Level

Concentration at the Fenceline (ug/m3): 3198

MAGLC (ug/m3): 4485

(5) 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 thatthe "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 previously modeled;

b. changes in the composition of the materials used, 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.).

(6) If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.

e) Reporting Requirements

(1) The permittee shall notify the Director (appropriate appropriate District Office or local air agency) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage restriction of 8 gallons. The notification

shall include a copy of such record and shall be sent to the Director (appropriate District Office or local air agency) within 45 days after the exceedance occurs.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

The VOC emissions from emissions unit K001, K002, K003, K004, K005, K006, K007 and K008 shall not exceed 43.71 tons per year (TPY) as a rolling 12-month summation, including both coatings and cleanup materials.

The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 tons/year for any single HAP and 24.9 tons/year for any combination of HAPs, per rolling 12 month summations.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the director (the appropriate district office or local air agency).

(3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

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

a. Emission Limitation:

The permittee shall not use more than 8 gallons of coating material per day for the coating of miscellaneous metal parts.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(1)c.

b. Emissions Limitation:

On the days when coating nonmetal parts the organic compound (OC) emissions from this emissions unit shall not exceed 8 pounds per hour and 40 pounds per day.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(1)h. and d)(1)f. respectively.

c. Emissions Limitation:

The VOC emissions and usages from emissions unit K001, K002, K003, K004, K005, K006, K007 and K008 shall not exceed 43.71 tons per year (TPY) as a rolling 12-month summation, including both coatings and cleanup materials.

Applicable compliance Method:

Compliance shall be based upon the record keeping specified in d)(2)i.

d. Emission Limitation-

The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 tons/year for any single HAP and 24.9 tons/year for any combination of HAPs, per rolling 12 month summations.

Applicable Compliance Method-

Compliance with the annual allowable individual HAP and combined HAP emission limitation above shall be based upon the record keeping requirements specified in d)(3)g. and d)(3)h. respectively.

(2) In accordance with OAC rule 3745-21-04(B)(5), facilities located in Ashtabula, Butler, Clark, Clermont, Cuyahoga, Delaware, Franklin, Geauga, Greene, Hamilton, Lake, Licking, Lorain, Lucus, Mahoning, Medina, Miami, Montgomery, Portage, Stark, Summit, Trumbull, Warren and Wood Counties shall use USEPA Method 24 to determine the VOC contents of the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

US EPA Method 24 or formulation data shall be used to determine the VOC contents of the cleanup materials.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, f)(1)b. shall be voided].

g) Miscellaneous Requirements

(1) None.