State of Ohio Environmental Protection Agency

STREET ADDRESS:
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50 W. Town St., Suite 700
Columbus, Ohio 43215

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

Certified Mail

8/29/2008

Mr. Jim Johnson
Kautex Textron
474 S. Nelson Ave.
Wilmington, OH 45177-0592

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

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0514010084
Permit Number: P0088745
Permit Type: Renewal
County: Clinton

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate ("PTIO") which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully.

Ohio EPA maintains a document entitled "Frequently Asked Questions about the PTIO". The document can be downloaded from the DAPC Web page, www.epa.state.oh.us/dapc, from the "Permits" link. This document contains additional information related to your permit, such as what activities are covered under the PTIO, who has enforcement authority over the permit and Ohio EPA's authorization to inspect your facility and records. Please contact the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469 if you need assistance.

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission ("ERAC") under Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and describe the action complained of and the grounds for the appeal. The appeal must be filed with the ERAC within thirty (30) days after notice of the Director's action. A filing fee of $70.00 must be submitted to the ERAC with the appeal, although the ERAC, has discretion to reduce the amount of the filing fee if you can demonstrate (by affidavit) that payment of the full amount of the fee would cause extreme hardship. If you file an appeal of this action, you must notify Ohio EPA of the filing of the appeal (by providing a copy to the Director) within three (3) days of filing your appeal with the ERAC. Ohio EPA requests that a copy of the appeal also be provided to the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the ERAC at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Southwest District Office. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page www.epa.state.oh.us/dapc.

Sincerely,

Michael W. Ahern

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

Cc: Ohio EPA-SWDO

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

FINAL

Air Pollution Permit-to-Install and Operate

for

Kautex Textron

Facility ID: 0514010084
Permit Number: P0088745
Permit Type: Renewal
Issued: 8/29/2008
Effective: 8/29/2008
Expiration: 8/29/2013

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install and Operate

for

Kautex Textron

Table of Contents

Authorization

Facility ID: 0514010084
Application Number(s): A0019927
Permit Number: P0088745
Permit Description: Magni Coating Line
Permit Type: Renewal
Permit Fee: $0.00
Issue Date: 8/29/2008
Effective Date: 8/29/2008
Expiration Date: 8/29/2013
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15
This document constitutes issuance to:

Kautex Textron
474 S. Nelson Ave
Wilmington, OH 45177

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:

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

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: P0088745
Permit Description: Magni Coating Line

Permits for the following emissions unit(s) or groups of emissions units are in this document as indicated below:

Emissions Unit ID:	**K002**
Company Equipment ID:	Magni Coating Line
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 Ohio EPA DAPC, Southwest District Office 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. K002, Magni Coating Line

Operations, Property and/or Equipment Description:

K002 - Magni Coating Line - metal parts dip tank with thermal oxidizer

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. b)(1)d, d)(5), d)(6), and d)(7).

(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)b , b)(2)b, c)(1), d)(3), d(4), e)(1), f)(1)b, f)(1)c, f(2), f(3), and f(4).

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) PTI 05-11558	5.7 pounds volatile organic compounds (VOC) per hour See Section b)(2)b.
b.	OAC rule 3745-31-05(D)	25.0 tons VOC per rolling 12-month period. The emissions of Hazardous Air Pollutants (HAPs) from this emissions unit shall be less than 9.0 tons for any single HAP and 24.0 tons for any combination of HAPs, based on rolling, 12-month summations. See Section b)(2)c.
c.	OAC rule 3745-21-09(U)(1)(c)	See Section b)(2)d.
d.	OAC rule 3745-114-01	Ohio Toxic Policy

(2) Additional Terms and Conditions

a. The hourly emissions limitation for VOC emissions was established to reflect potential to emit for this emission unit. Therefore, establishing record keeping and reporting requirements to ensure compliance with these limitations is not necessary.

b. The volatile organic compound emissions from the coating booth and drying oven shall be equipped with permanent total enclosure to ensure 100% capture. The volatile organic compound emissions from the coating booth and drying oven shall be vented to a thermal incinerator operating at a minimum destruction efficiency of 95%.

c. The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility, as defined in OAC rule 3745-31-05(BB), shall be less than 9.0 tons for any single HAP and 24.0 tons for any combination of HAPs, based on rolling, 12-month summations.

d. Coatings applied in the coating operations shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents, as the maximum VOC content of each coating or as a daily volume-weighted average; or, where the thermal incinerator is employed to demonstrate compliance, 6.7 pounds of VOC per gallon of solids.

[OAC rule 3745-21-09]

c) Operational Restrictions

(1) The maximum annual coating usage for this emissions unit shall not exceed 184,000 gallons, as applied, based upon a rolling, 12-month summation of the coating usage

(2) The permittee shall operate and maintain the continuous temperature monitor and recorder to measure and record the combustion temperature within the thermal incinerator when the thermal incinerator is being employed to reduce VOC emissions from the operation of this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

(1) When the thermal incinerator is being employed to reduce VOC emissions, the permittee shall operate and maintain the continuous temperature monitor and recorder to measure and record the combustion temperature within the thermal incinerator when the emissions unit is in operation and the thermal incinerator is being employed to reduce VOC emissions. @

a. The permittee shall install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer=s recommendations, with any modifications deemed necessary by the permittee.

b. The permittee, shall demonstrate compliance with a limitation based on pounds of VOC per gallon of coating solids, and shall collect and record the following information each day for the coating line and control equipment:

i. the name and identification number of each coating, as applied;

ii. the pounds of VOC per gallon of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating;

iii. the maximum VOC content (in pounds of VOC per gallon of coating solids, as applied) or the daily volume-weighted average VOC content (in pounds of VOC per gallon of coating solids, as applied) of all the coatings;

iv. the calculated, controlled VOC emission rate, in pounds of VOC per gallon of coating solids, as applied, calculated using either the maximum VOC content or the daily volume-weighted VOC content recorded in accordance with paragraph (c) above; and the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance;

v. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and

vi. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

[OAC rule 3745-21-09(B)(3)(j)]

(2) When the thermal incinerator is not being employed to reduce VOC emissions, the permittee, having chosen to demonstrate compliance by means of a daily volume-weighted average VOC content, shall collect and record the following information:

a. the name and identification number of each coating, as applied;

b. the mass of VOC per volume of coating (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and

c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for $C_{VOC,2}$, as follows:

$$(C_{VOC,2})_A = \sum_{i=1}^{n} C_{VOC,2i} L_{Ci} (V_{Si} + V_{VOCi}) / \sum_{i=1}^{n} L_{Ci} (V_{Si} + V_{VOCi})$$

Where:

$(C_{VOC,2})_A$ = daily volume-weighted average VOC content of all coatings, as applied.

$C_{VOC,2}$ is the VOC content in pounds of VOC per gallon of coating, excluding water and exempt solvents calculated as follows:

$C_{VOC,2} = (D_C)(W_{VOC}) / V_S + V_{VOC}$

Where:

D_C = density of coating, in pounds of coating per gallon of coating.

$W_{VOC} = W_{VM} - W_W - W_{ES}$

V_S = the volume fraction of solids in coating, in gallons of solids per gallon of coating.

$V_{VOC} = V_{VM} - V_W - V_{ES}$

W_{VM} = weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating.

W_W = weight fraction of water in coating, in pound of water per pound of coating.

W_{ES} = weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating.

V_{VM} = volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating.

V_W = volume fraction of water in coating, in gallon of water per gallon of coating.

V_{ES} = volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating.

A = subscript denoting that the indicated VOC content is a weighted average of the coatings employed during time period “t”.

L_C = liquid volume of coating employed during time period “t”, in gallons of coating.

M_C = mass of coating employed during the time period “t”, in pounds of coating.

i = subscript denoting a specific coating employed during time period “t”.

n = total number of coatings employed during time period “t”.

t = time period specified for the weighted average VOC content.

These records shall be maintained for a period of not less than three years.

[OAC rule 3745-21-09(B)(3)(h)] and [OAC rule 3745-21-10(B)(9)]

(3) The permittee shall collect and record monthly the following information for the purpose of determining the rolling 12-month VOC emissions:

a. the name and identification of each cleanup material employed;

b. the amount of cleanup material, in gallons;

c. the VOC content of each cleanup material, in pounds per gallon;

d. the calculated, VOC emission rate from all cleanup materials, in tons per month, (the summation of: [("b" x "c") / 2000lbs/ton];

e. the name and of each coating, as applied, when the thermal incinerator was being employed to reduce VOC emissions;

f. the amount of each coating employed, in gallons of each coating, as applied when the thermal incinerator was being employed to reduce VOC emissions;

g. the VOC content of each coating applied, in pounds per gallon, when the thermal incinerator was being employed to reduce VOC emissions;

h. the total VOC generated by the coatings employed, when the thermal incinerator was being employed to reduce VOC emissions, in tons per month, (the summation of: [("f" x "g") / 2000 lbs/ton]), in pounds or tons;

i. the total controlled VOC emitted to the ambient air from coating usage, when the thermal incinerator was being employed to reduce VOC emissions, in tons per month, (the summation of: ["g" x (1- 95%)]);

j. the name and of each coating, as applied, when the thermal incinerator was not being employed to reduce VOC emissions;

k. the amount of each coating applied, in gallons, when the thermal incinerator was not being employed to reduce VOC emissions;

l. the VOC content of each coating applied, in pounds per gallon, when the thermal incinerator was not being employed to reduce VOC emissions;

m. the total VOC emitted by the coatings employed, when the thermal incinerator was not being employed to reduce VOC emissions, in tons per month, (the summation of: [("k" x "l") / 2000 lbs/ton]), in pounds or tons;

n. the total amount of VOC emitted, in tons per month, (the summation of: ("d" + "h"+”m”)); and

o. the rolling 12-month VOC emissions, in tons (the summation of the total amount of VOC emitted in "n", plus the combined VOC emissions from the previous 11 month.

(4) The permittee shall collect and record the following information each month for the HAP(s) employed in the emissions units at this facility:

a. the emissions unit's source identification and description that Hazardous Air Pollutant (HAP) containing materials were employed;

b. the name and identification number of each HAP containing material employed;

c. the individual HAP* content for each HAP containing material employed, in pounds of individual HAP per gallon, as employed;

d. the amount of each HAP containing material employed, in gallons;

e. the individual HAP emitted for each HAP containing material employed in the above identified emissions unit, in pounds or tons per month, (the summation of ("c" x "d")*);

f. the total individual HAP emitted from each individual emissions unit, in pounds or tons per month, (the combined total of "e" for each identified emissions unit);

g. the total facility-wide individual HAP emission rate, in tons per month, (the combined total of "f" for all emissions units emitting the specific HAP);

h. the total combined HAP emissions, in pounds or tons per month, (the combined total of "g" for all emissions units emitting any HAP;

i. the updated rolling, 12-month emission summation for each individual HAP, in pounds or tons, (this shall include the information for the current month, "g, ' and the total combined individual HAP emissions from the preceding eleven calendar months); and

j. the updated rolling, 12-month emission summation for total combined HAP**, in pounds or tons, (this shall include the information for the current month, "h", and the total combined emissions from the preceding eleven calendar months).* If the emissions unit is controlled, the HAP emissions will be reduced based on the overall control efficiency from the most recent stack test results.

(5) The permit to install for this emissions unit (K002) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Formaldehyde

TLV (mg/m3): 0.37

Maximum Hourly Emission Rate (lbs/hr): 1.14

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 3.84

MAGLC (ug/m3): 8.8

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

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

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

a. 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.

e) Reporting Requirements

(1) 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:

   i. the rolling, 12-month coating usage of 184,000 gallons;

   ii. the rolling, 12-month VOC emission limitation of 25.0 tons;

   iii. the facility-wide rolling, 12-month individual HAP emission limitation of less than 9.0 tons, from all materials employed at this facility; and

   iv. the facility-wide rolling, 12-month combined HAP emission limitation of less than 24.0 tons, from all materials employed at this facility.

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).

[OAC rule 3745-15-03(B)(1)(b)] and [OAC rule 3745-15-03(C)]

(2) 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.

[OAC rule 3745-15-03(B)(2)] and [OAC rule 3745-15-03(D)].

(3) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the calculated, controlled VOC emission rate exceeds the applicable pounds of VOC per gallon of solids limitation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

The permittee shall submit quarterly temperature deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than

50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

[OAC rule 3745-21-09(B)(3)(j) and (k)]

(4) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

[OAC rule 3745-21-09(B)(3)(i)]

f) Testing Requirements

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

a. Emission Limitation:

5.7 lbs VOC per hour

The hourly VOC emission limitation was established by the following methodology:

HER = [(Cu x Vc) x (1-Ce)]

Where:

HER = Maximum Hourly VOC Emission Rate, in lbs of VOC per hour;

Cu = Maximum Hourly Coating Usage Rate, in gallons (21 gallons, from PTI 05-11558, Emission Activity Category form);

Vc = Maximum VOC content, in lbs of VOC per gallon of coating, as applied (5.15 lbs per gallon, from PTI 05-11558, Emission Activity Category form);

Ce = Overall Control efficiency, in percent controlled (assumed 95% until replaced by result of most recent compliance demonstration).

Applicable Compliance Method;

Compliance shall be based on the above equation represents that maximum hourly potential of this emissions unit. Any future modifications to this emissions unit that would cause the hourly potential to exceed the above limitation will need to comply with required air pollution permit requirements prior to being initiated.

b. Emission Limitation:

25.0 tons of VOC per rolling 12-month period

The annual VOC emission limitation was established by the following methodology:

AER = [(Cu x Vc) x (1-Ce)]/2000

Where:

AER = Maximum Annual VOC Emission Rate, in tons of VOC per year;

Cu = Maximum Rolling 12-month Coating Usage Rate, in gallons (184,000 gallons, from PTI 05-11558, Emission Activity Category form);

Vc = Maximum VOC content, in lbs of VOC per gallon of coating, as applied (5.15 lbs per gallon, from PTI 05-11558, Emission Activity Category form);

Ce = Overall Control efficiency, in percent controlled (assumed 95% until replaced by result of most recent compliance demonstration).

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements of Sections d)(3), of this permit.

c. Emission Limitation:

9.0 tons for any individual HAP and 24.0 tons for any combination of HAPs as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined through the record keeping requirements as specified in d)(4).

d. Emission Limitation:

When not employing the thermal incinerator to reduce VOC emissions, coatings applied in the coating operations shall not exceed 3.5 pounds of VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be determined through the record keeping requirements as specified in d)(1)b.

e. Emission Limitation:

When employing the thermal incinerator to reduce VOC emissions, 6.7 pounds of VOC emitted per gallon of solids employed.

Applicable Compliance Method:

Compliance shall be determined through the record keeping requirements as specified in d)(1)b.

(2) The permittee shall conduct, or have conducted, for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 1 year of issuance of this permit.

b. The emission testing shall be conducted to demonstrate compliance with:

i. the allowable mass emissions rates of 5.7 lbs of VOC per hour, and 6.7 lbs of VOC per gallon of solids employed.;

ii. The emission testing shall be conducted to demonstrate compliance with the control efficiency of at least 95% destruction efficiency in the thermal incinerator; and

iii. The permanent total enclosure to ensure 100% capture;

c. The following test method(s) shall be employed to demonstrate compliance with the allowable required efficiences:

i. US EPA Reference Method 25 of 40 CFR Part 60, Appendix A or Method 25A - if applicable.

ii. Destruction Efficiency of the common control device: The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA.

The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

iii. Capture Efficiency of the building enclosure: The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement).

Alternative U.S. EPA-approved test methods may be used The test(s) shall be conducted while the emission units being controlled by the control device(s) are being operated at or near their maximum capacities, unless otherwise specified or approved by the Ohio EPA, Southwest District Office.

(3) The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test

methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

(4) Formulation data or USEPA Method 24 shall be used to determine the volatile organic compound content of materials added to this emissions unit.

g) Miscellaneous Requirements

(1) None.