



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

1/29/2009

Robert Breckel  
Fypon, Ltd  
960 West Barre Road  
P.O. BOX 301  
Archbold, OH 43502-0301

Certified Mail  
Facility ID: 0326000060  
Permit Number: P0086996  
County: Fulton

RE: DRAFT AIR POLLUTION TITLE V PERMIT  
Permit Type: Renewal

Dear Permit Holder:

A draft of the OAC Chapter 3745-77 Title V permit for the referenced facility has been issued. The purpose of this draft is to solicit public comments. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Fulton County Expositor. A copy of the public notice, the Statement of Basis, and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page <http://www.epa.state.oh.us/dapc> in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the permit or in narrative format. Any comments must be sent to the following:

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

and Ohio EPA DAPC, Northwest District Office  
347 North Dunbridge Road  
Bowling Green, OH 43402

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 processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461.

Sincerely,

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

Cc: U.S. EPA Region 5 - *Via E-Mail Notification*  
Ohio EPA-NWDO; Michigan; Indiana

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



PUBLIC NOTICE  
ISSUANCE OF DRAFT AIR POLLUTION Title V Permit  
Fypon, Ltd

Issue Date: 1/29/2009

Permit Number: P0086996

Permit Type: Renewal

Permit Description: Renewal Title V permit

Facility ID: 0326000060

Facility Location: Fypon, Ltd  
960 West Barre Road,  
Archbold, OH 43502-0301

Facility Description: All Other Plastics Product Manufacturing

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 Title V operating permit 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 Donald Waltermeyer at Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road or (419)352-8461. The permit, which includes a detailed description of the operations, and associated statement of basis for the permit requirements, can be downloaded from the Web page: [www.epa.state.oh.us/dapc](http://www.epa.state.oh.us/dapc)





State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

Title V Permit Statement of Basis  
Permit Number: P0086996  
Facility ID: 0326000060

## Statement of Basis For Air Pollution Title V Permit

|  |  |
|--|--|
| Facility ID:   | 0326000060                                   |
| Facility Name:   | Fypon, Ltd                                   |
| Facility Description:  | Plastics Product Manufacturing               |
| Facility Address:  | 960 West Barre Road, Archbold, OH 43502-0301 |
| Permit #:  | P0086996, Renewal                            |
| This facility is subject to Title V because it is major for:<br><input type="checkbox"/> Lead <input type="checkbox"/> Sulfur Dioxide <input type="checkbox"/> Carbon Monoxide <input checked="" type="checkbox"/> Volatile Organic Compounds <input type="checkbox"/> Nitrogen Oxides<br><input type="checkbox"/> Particulate Matter ≤ 10 microns <input type="checkbox"/> Single Hazardous Air Pollutant <input type="checkbox"/> Combined Hazardous Air Pollutants<br><input type="checkbox"/> Maximum Available Control Technology Standard(s) |  |

### A. Standard Terms and Conditions

|  |     |
|--|-----|
| Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?   | Yes |
| Were there any common control issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.  | No  |
| Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1) | N/A |
| Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule            | N/A |



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

Title V Permit Statement of Basis  
Permit Number: P0086996  
Facility ID: 0326000060

|   |     |
|---|-----|
| 3745-77-08(C)(3)  |     |
| Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D) | N/A |
| Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)    | N/A |

**B. Facility-Wide Terms and Conditions**

| Term and Condition (paragraph) | Basis        |       | <u>Comments</u>   |
|--------------------------------|--------------|-------|---|
|                                | SIP (3745- ) | Other |   |
| B.1                            |              |       | Lists Facility wide terms and conditions that are enforceable under state law only.                     |
| B.2                            | 77-07(A)(13) |       | Lists insignificant emission units that have one or more applicable requirements.                       |
| B.3                            |              |       | Lists insignificant emission units that are "de minimis" or not subject to any applicable requirements. |

**C. Emissions Unit Terms and Conditions**

| <p>Key:<br/>           EU = emissions unit ID<br/>           ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)<br/>           OR = operational restriction<br/>           M = monitoring requirements<br/>           St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement<br/>           ENF = did noncompliance issues drive the monitoring requirements?<br/>           R = record keeping requirements<br/>           Rp = reporting requirements<br/>           ET = emission testing requirements (not including compliance method terms)<br/>           Misc = miscellaneous requirements</p> |            |              |       |    |    |   |    |     |   |    |    |    |    |      |  |
|--|------------|--------------|-------|----|----|---|----|-----|---|----|----|----|----|------|--|
| EU(s)  | Limitation | Basis        |       | ND | OR | M | St | ENF | R | St | Rp | St | ET | Misc | <u>Comments</u>  |
|  |            | SIP (3745- ) | Other |    |    |   |    |     |   |    |    |    |    |      |  |
| R002<br>R005<br>R006   | Exempt     | 17-07(A)     | N     | Y  | N  | N | N  | N   | N | N  | N  | N  | N  | N    | ND-This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A) |



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

Title V Permit Statement of Basis  
Permit Number: P0086996  
Facility ID: 0326000060

|  |        |          |   |   |   |   |   |   |   |   |   |   |   |   |   |   |
|--|--------|----------|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| R008<br>R009<br>R010<br>R011<br>R012<br>R013<br>R014<br>R016                         |        |          |   |   |   |   |   |   |   |   |   |   |   |   |   | <p>pursuant to OAC rule 3745-17-07(A)(3)(h) because OAC rule 3745-17-11 is not applicable.</p> <p>M, R, Rp &amp; ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.</p>  |
| R002<br>R005<br>R006<br>R008<br>R009<br>R010<br>R011<br>R012<br>R013<br>R014<br>R016 | Exempt | 17-11(B) | N | Y | N | N | N | N | N | N | N | N | N | N | N | <p>ND-The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Fulton County.</p> <p>M, R, Rp &amp; ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.</p>   |
| R002<br>R005<br>R006<br>R008<br>R009<br>R010<br>R011<br>R012<br>R013<br>R014<br>R016 | None   | 17-11(C) | N | N | Y | Y | N | N | Y | N | Y | N | N | N | N | <p>OR-Includes the use of a dry particulate filter. M/R includes maintaining documentation of the operating manuals for the dry particulate filter, periodic and comprehensive inspections of the filter with documentation of the filter inspection. There should be records maintained during any period the dry particulate filter is not in service. Rp includes quarterly deviation reports that identify daily records of the dry particulate not being in service.</p> <p>ET-There are no emission limitations established pursuant to this rule; therefore, no testing is required.</p> |
| P901<br>R005<br>R006<br>R008<br>R009<br>R010<br>R011                                 | None   | 21-07(G) | N | N | Y | Y | N | N | Y | N | Y | N | N | N | N | <p>OR-States that no cleanup material shall be used that is photo-chemically reactive. M/R includes company identification of each cleanup material employed and documentation of whether or not each cleanup material is photochemically reactive. Rp includes notification in writing of any noncomplying cleanup material that is used.</p> <p>ET-There are no emission limitations established</p>  |





State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

Title V Permit Statement of Basis  
Permit Number: P0086996  
Facility ID: 0326000060

|                      |   |   |             |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|----------------------|---|---|-------------|--|--|--|--|--|--|--|--|--|--|--|--|--|--|
| R002                 | 0.5 ton PE/yr                                       | N | 31-05(A)(3) |  |  |  |  |  |  |  |  |  |  |  |  |  | <p>OR-Includes the use of a dry particulate filter. M/R includes maintaining documentation of the operating manuals for the dry particulate filter, periodic and comprehensive inspections of the filter with documentation of the filter inspection. There should be records maintained during any period the dry particulate filter is not in service. Rp includes quarterly deviation reports that identify daily records of the dry particulate hot being in service.</p> <p>ET-Compliance can be determined using the following equation:<br/> <math>E = \text{particulate emissions rate (tons/yr)}</math><br/> <math>E = [\text{coating solids usage rate (this is calculated by summing the 12 monthly coating solids usage rates, from section 2.f. for the calendar year), in tons per year}] \times (1-TE) \times (1-CE)</math><br/>           Where:<br/>           TE= transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coatings used<br/>           CE= control efficiency of the control equipment</p> |
| R005<br>R006         | 17.5 lb OC/hr                                       | N | 31-05(A)(3) |  |  |  |  |  |  |  |  |  |  |  |  |  | <p>OR-Restricts the use of photochemically reactive materials. M/R includes collecting and recording the following information: the company identification for each coating, the OC content of each coating employed, the solids content of each coating employed, the number of gallons of coating, the total OC emission rate and the total coating solids usage rate for any coating employed. Rp includes notifying the Director in writing if any noncompliant coatings are used.</p> <p>ET-Compliance shall be determined by multiplying the maximum coating usage rate (gallons/hr) by the maximum OC content of all the coatings.</p>  |
| R005<br>R006         | 76.7 ton OC/yr                                      | N | 31-05(A)(3) |  |  |  |  |  |  |  |  |  |  |  |  |  | <p>OR-Restricts the use of photochemically reactive materials. M/R includes collecting and recording the following information: the company identification for each coating, the OC content of each coating employed, the solids content of each coating employed, the number of gallons of coating, the total OC emission rate and the total coating solids usage rate for any coating employed. Rp includes notifying the Director in writing if any noncompliant coatings are used.</p> <p>ET- Compliance with the annual limitation will be assumed as long as compliance with the hourly limitation is maintained. (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).</p>  |
| R005<br>R006<br>R016 | 80.0 ton OC/yr combined for rolling 12-month period | N | 31-05(D)    |  |  |  |  |  |  |  |  |  |  |  |  |  | <p>OR-Restricts the use of photochemically reactive materials. M/R includes collecting and recording the following information: the company identification for each coating, the OC content of each coating employed, the solids content of each coating employed, the number of gallons of coating, the total OC emission rate, the total coating solids usage rate for any coating employed and the rolling, 12-month summation of the monthly OC emission rates. Rp includes submitting quarterly deviation reports month OC emission limitation of 80 tons as well as notifying the Director in writing if any noncompliant coatings are used.</p> <p>ET-Compliance shall be based upon the recordkeeping requirements specified in the permit.</p>  |



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

Title V Permit Statement of Basis  
Permit Number: P0086996  
Facility ID: 0326000060

|  |  |   |                 |   |   |   |   |   |   |   |   |   |   |   |   |
|--|--|---|-----------------|---|---|---|---|---|---|---|---|---|---|---|---|
| R005<br>R006   | 0.65 lb PE/hr  | N | 31-05<br>(A)(3) | N | Y | Y | N | N | Y | N | Y | N | N | N | <p>OR-Includes the use of a dry particulate filter. M/R includes maintaining documentation of the operating manuals for the dry particulate filter, periodic and comprehensive inspections of the filter with documentation of the filter inspection. There should be records maintained during any period the dry particulate filter is not in service. Rp includes quarterly deviation reports that identify daily records of the dry particulate not being in service.</p> <p>ET-Compliance can be determined using the following equation:<br/> <math>E = \text{particulate emissions rate (lbs/hr)}</math><br/> <math>E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1-TE) \times (1-CE)</math></p> <p>Where:<br/> TE= transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coatings used<br/> CE= control efficiency of the control equipment</p>   |
| R005<br>R006   | 2.8 ton PE/yr  | N | 31-05<br>(A)(3) | N | Y | Y | N | N | Y | N | Y | N | N | N | <p>OR-Includes the use of a dry particulate filter. M/R includes maintaining documentation of the operating manuals for the dry particulate filter, periodic and comprehensive inspections of the filter with documentation of the filter inspection. There should be records maintained during any period the dry particulate filter is not in service. Rp includes quarterly deviation reports that identify daily records of the dry particulate not being in service.</p> <p>ET- The tons/yr limitation was developed by multiplying the 0.65 lb/hr limitation by 8760, and then dividing by 2000.</p>  |
| R005<br>R006<br>R016                                 | 3.6 ton PE/yr<br>combined for<br>R005, R006,<br>R016 | N | 31-05(D)        | N | Y | Y | N | N | Y | N | Y | N | N | N | <p>OR-Includes the use of a dry particulate filter. M/R includes maintaining documentation of the operating manuals for the dry particulate filter, periodic and comprehensive inspections of the filter with documentation of the filter inspection. There should be records maintained during any period the dry particulate filter is not in service. Rp includes quarterly deviation reports that identify daily records of the dry particulate not being in service.</p> <p>ET-Compliance can be determined using the following equation:<br/> <math>E = \text{particulate emissions rate (tons/yr)}</math><br/> <math>E = [\text{coating solids usage rate (this is calculated by summing the 12 monthly coating solids usage rates for the calendar year), in tons per year}] \times (1-TE) \times (1-CE)</math></p> <p>Where:<br/> TE= transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coatings used<br/> CE= control efficiency of the control equipment</p> |
| R008<br>R009<br>R010<br>R011<br>R012<br>R013<br>R014 | 15.0 lbs OC/hr                                       | N | 31-05<br>(A)(3) | N | Y | Y | N | N | Y | N | Y | N | N | N | <p>OR-Restricts the use of photochemically reactive materials. M/R includes collecting and recording the for each coating, the OC content of each coating employed, the solids content of each coating employed, the number of gallons of coating, the total OC emission rate and the total coating solids usage rate for any coating employed. Rp includes notifying the Director in writing if any noncompliant coatings are used.</p> <p>ET-Compliance shall be determined by multiplying the maximum coating usage rate (gallons/hr) by the maximum OC content of all the coatings.</p>   |



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

Title V Permit Statement of Basis  
Permit Number: P0086996  
Facility ID: 0326000060

|  |   |   |                 |   |   |   |   |   |   |   |   |   |   |   |  |
|--|---|---|-----------------|---|---|---|---|---|---|---|---|---|---|---|--|
| R008<br>R009<br>R010<br>R011<br>R012<br>R013<br>R014 | 65.7 ton OC/yr                                      | N | 31-05<br>(A)(3) | N | Y | Y | N | N | Y | N | Y | N | N | N | OR-Restricts the use of photochemically reactive materials. M/R includes collecting and recording the following information: the company identification for each coating, the OC content of each coating employed, the solids content of each coating employed, the number of gallons of coating, the total OC emission rate and the total coating solids usage rate for any coating employed. Rp includes notifying the Director in writing if any noncompliant coatings are used.<br><br>ET-Compliance with the annual limitation will be assumed as long as compliance with the hourly limitation is maintained. (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).  |
| R008<br>R009<br>R010<br>R011<br>R012<br>R013<br>R014 | 75.0 ton OC/yr combined for rolling 12-month period | N | 31-05(D)        | N | Y | Y | N | N | Y | N | Y | N | N | N | OR-Restricts the use of photochemically reactive materials. M/R includes collecting and recording the following information: the company identification for each coating, the OC content of each coating employed, the solids content of each coating employed, the number of gallons of coating, the total OC emission rate, the total coating solids usage rate for any coating employed and the rolling, 12-month summation of the monthly OC emission rates. Rp includes submitting quarterly deviation reports which identify any exceedances of the rolling, 12-month emission limitation of 80 tons as well as notifying the Director in writing if any noncompliant coatings are used.<br><br>ET-Compliance shall be based upon the recordkeeping requirements specified in the permit.  |
| R008<br>R009<br>R010<br>R011<br>R012<br>R013<br>R014 | 0.29 lb PE/hr                                       | N | 31-05<br>(A)(3) | N | Y | Y | N | N | Y | N | Y | N | N | N | OR-Includes the use of a dry particulate filter. M/R includes maintaining documentation of the operating manuals for the dry particulate filter, periodic and comprehensive inspections of the filter with documentation of the filter inspection. There should be records maintained during any period the dry particulate filter is not in service. Rp includes quarterly deviation reports that identify daily records of the dry particulate not being in service.<br><br>ET-Compliance can be determined using the following equation:<br><br>$E = \frac{\text{particulate emissions rate (lbs/hr)}}{(1-TE) \times (1-CE)}$<br>Where:<br>TE= transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coatings used<br>CE= control efficiency of the control equipment |
| R008<br>R009<br>R010<br>R011<br>R012<br>R013<br>R014 | 1.3 ton PE/yr                                       | N | 31-05<br>(A)(3) | N | Y | Y | N | N | Y | N | Y | N | N | N | OR-Includes the use of a dry particulate filter. M/R includes maintaining documentation of the operating manuals for the dry particulate filter, periodic and comprehensive inspections of the filter with documentation of the filter inspection. There should be records maintained during any period the dry particulate filter is not in service. Rp includes quarterly deviation reports that identify daily records of the dry particulate not being in service.<br><br>ET-The tons/yr limitation was developed by multiplying the 0.29 lb/hr limitation by 8760, and then dividing by 2000. If compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.  |



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

Title V Permit Statement of Basis  
Permit Number: P0086996  
Facility ID: 0326000060

|  |   |   |             |   |   |   |   |   |   |   |   |   |   |   |   |
|--|---|---|-------------|---|---|---|---|---|---|---|---|---|---|---|---|
| R008<br>R009<br>R010<br>R011<br>R012<br>R013<br>R014 | 1.5 ton PE/yr<br>combined for<br>R008,<br>R009,R010,<br>R011, R012,<br>R013, R014 | N | 31-05(D)    | N | Y | Y | N | N | Y | N | Y | N | N | N | <p>OR-Includes the use of a dry particulate filter. M/R includes maintaining documentation of the operating manuals for the dry particulate filter, periodic and comprehensive inspections of the filter with documentation of the filter inspection. There should be records maintained during any period the dry particulate filter is not in service. Rp includes quarterly deviation reports that identify daily records of the dry particulate hot being in service.</p> <p>ET-Compliance can be determined using the following equation:<br/> <math>E = \text{particulate emissions rate (tons/yr)}</math><br/> <math>E = [\text{coating solids usage rate (this is calculated by summing the 12 monthly coating solids usage rates for the calendar year), in tons per year}] \times (1-TE) \times (1-CE)</math><br/>           Where:<br/>           TE= transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coatings used<br/>           CE= control efficiency of the control equipment</p> |
| R016   | 48.0 lb OC/hr   | N | 31-05(A)(3) | N | Y | Y | N | N | Y | N | Y | N | N | N | <p>OR-Restricts the use of photochemically reactive materials. M/R includes collecting and recording the following information: the company identification for each coating, the OC content of each coating employed, the solids content of each coating employed, the number of gallons of coating, the total OC emission rate and the total coating solids usage rate for any coating employed. Rp includes notifying the Director in writing if any noncompliant coatings are used.</p> <p>ET-Compliance shall be determined by multiplying the maximum coating usage rate (gallons/hr) by the maximum OC content of all the coatings.</p>   |
| R016   | 1.78 lb PE/hr   | N | 31-05(A)(3) | N | Y | Y | N | N | Y | N | Y | N | N | N | <p>OR-Includes the use of a dry particulate filter. M/R includes maintaining documentation of the operating manuals for the dry particulate filter, periodic and comprehensive inspections of the filter with documentation of the filter inspection. There should be records maintained during any period the dry particulate filter is not in service. Rp includes quarterly deviation reports that identify daily records of the dry particulate hot being in service.</p> <p>ET-Compliance can be determined using the following equation:<br/> <math>E = \text{particulate emissions rate (lbs/hr)}</math><br/> <math>E = (\text{maximum coating solids usage rate, in lbs/hr}) \times (1-TE) \times (1-CE)</math><br/>           Where:<br/>           TE= transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coatings used<br/>           CE= control efficiency of the control equipment</p>   |



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

**DRAFT**

**Air Pollution Title V Permit  
for  
Fypon, Ltd**

Facility ID: 0326000060

Permit Number: P0086996

Permit Type: Renewal

Issued: 1/29/2009

Effective: To be entered upon final issuance

Expiration: To be entered upon final issuance





State of Ohio Environmental Protection Agency  
 Division of Air Pollution Control

**Air Pollution Title V Permit**  
 for  
 Fypon, Ltd

**Table of Contents**

Authorization ..... 1

A. Standard Terms and Conditions ..... 2

    1. Federally Enforceable Standard Terms and Conditions ..... 3

    2. Monitoring and Related Record Keeping and Reporting Requirements..... 3

    3. Scheduled Maintenance..... 6

    4. Risk Management Plans ..... 6

    5. Title IV Provisions ..... 6

    6. Severability Clause ..... 7

    7. General Requirements ..... 7

    8. Fees..... 8

    9. Marketable Permit Programs..... 8

    10. Reasonably Anticipated Operating Scenarios ..... 8

    11. Reopening for Cause ..... 8

    12. Federal and State Enforceability ..... 9

    13. Compliance Requirements ..... 9

    14. Permit Shield ..... 10

    15. Operational Flexibility..... 10

    16. Emergencies ..... 11

    17. Off-Permit Changes ..... 11

    18. Compliance Method Requirements ..... 11

    19. Insignificant Activities or Emissions Levels..... 12

    20. Permit to Install Requirement ..... 12

    21. Air Pollution Nuisance ..... 12

    22. Permanent Shutdown of an Emissions Unit ..... 12

    23. Title VI Provisions ..... 12

    24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only ..... 13

    25. Records Retention Requirements Under State Law Only..... 13

    26. Inspections and Information Requests ..... 13

    27. Scheduled Maintenance/Malfunction Reporting ..... 14

    28. Permit Transfers ..... 14



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

|   |    |
|---|----|
| 29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations ..... | 14 |
| B. Facility-Wide Terms and Conditions.....  | 15 |
| C. Emissions Unit Terms and Conditions .....  | 17 |
| 1. P901, Clean up (plantwide).....  | 18 |
| 2. R002, Master/Carrier Booth .....   | 22 |
| 3. Emissions Unit Group - Group 1: R005, R006, R016, .....  | 29 |
| 4. Emissions Unit Group - Group 2: R008, R009, R010, R011, R012, R013, R014,.....   | 36 |



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Title V Permit**

**Permit Number:** P0086996

**Facility ID:** 0326000060

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

## Authorization

Facility ID: 0326000060

Facility Description:

Application Number(s): A0017880

Permit Number: P0086996

Permit Description: Renewal Title V permit

Permit Type: Renewal

Issue Date: 1/29/2009

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

Superseded Permit Number: P0086995

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

Fypon, Ltd  
960 West Barre Road  
Archbold, OH 43502-0301

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

Ohio EPA DAPC, Northwest District Office  
347 North Dunbridge Road  
Bowling Green, OH 43402  
(419)352-8461

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski  
Director



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Title V Permit**

**Permit Number:** P0086996

**Facility ID:** 0326000060

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

## **A. Standard Terms and Conditions**



**1. Federally Enforceable Standard Terms and Conditions**

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

**2. Monitoring and Related Record Keeping and Reporting Requirements**

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



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

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

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

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

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

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

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

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



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

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

See A.29 below if no deviations occurred during the quarter.

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

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

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

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

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



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

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

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

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

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

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

### **3. Scheduled Maintenance**

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

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

### **4. Risk Management Plans**

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

- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

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

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

### **5. Title IV Provisions**

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

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



**6. Severability Clause**

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.  
*(Authority for term: OAC rule 3745-77-07(A)(6))*

**7. General Requirements**

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



(3) a combination of (1) and (2) above.

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

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

**8. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

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

**9. Marketable Permit Programs**

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

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

**10. Reasonably Anticipated Operating Scenarios**

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

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

**11. Reopening for Cause**

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

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



statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.  
*(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))*

## **12. Federal and State Enforceability**

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

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

## **13. Compliance Requirements**

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
  - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.



d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

(a) An identification of each term or condition of this permit that is the basis of the certification.

(b) The permittee's current compliance status.

(c) Whether compliance was continuous or intermittent.

(d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.

(e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

*(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))*

#### **14. Permit Shield**

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

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

#### **15. Operational Flexibility**

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the



Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

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

**16. Emergencies**

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

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

**17. Off-Permit Changes**

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

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

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

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

**18. Compliance Method Requirements**

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the



permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.  
*(This term is provided for informational purposes only.)*

**19. Insignificant Activities or Emissions Levels**

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.  
*(Authority for term: OAC rule 3745-77-07(A)(1))*

**20. Permit to Install Requirement**

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.  
*(Authority for term: OAC rule 3745-77-07(A)(1))*

**21. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.  
*(Authority for term: OAC rule 3745-77-07(A)(1))*

**22. Permanent Shutdown of an Emissions Unit**

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

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

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

**23. Title VI Provisions**

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



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

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

The permittee shall submit required reports in the following manner:

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

**25. Records Retention Requirements Under State Law Only**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

**26. Inspections and Information Requests**

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



EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

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

**27. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**28. Permit Transfers**

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

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

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

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

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



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Title V Permit**

**Permit Number:** P0086996

**Facility ID:** 0326000060

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

## **B. Facility-Wide Terms and Conditions**



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - a) 3.
  
2. The following insignificant emission units at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified permit to install for the emission unit. The insignificant emission units listed below are subject to one or more applicable requirements contained in a permit-to-install or in the SIP-approved versions of OAC Chapters 3745-17, 3745-18 and 3745-21.
  - a) B001 – Air Make-up Unit #1;
  - b) B002 – Air Make-up Unit #2; and
  - c) B003 – Air Make-up Unit #3.

[Authority for Term: OAC rule 3745-77-07(A)(13)]
  
3. The following insignificant emissions units are exempt from permit requirements because they are not subject to any applicable requirements or because they meet the “de minimis” criteria established in OAC rule 3745-15-05:
  - a) Z001 – Bulk Storage Tank #1 (Resin);
  - b) Z002 – Bulk Storage Tank #2 (Resin);
  - c) Z003 – Bulk Storage Tank #3 (Isocyanate); and
  - d) Z004 – Bulk Storage Tank #4 (Isocyanate).



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Title V Permit**

**Permit Number:** P0086996

**Facility ID:** 0326000060

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

## **C. Emissions Unit Terms and Conditions**



**1. P901, Clean up (plantwide)**

**Operations, Property and/or Equipment Description:**

Plantwide clean up

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

(1) d)(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)<br>(PTI #03-11125, issued on 10/15/98) | 4.0 tons organic compounds (OC)/month             |
| b. | OAC rule 3745-31-05(D)<br>(PTI #03-11125, issued on 10/15/98)    | See b)(2)a.                                       |
| c. | OAC rule 3745-21-07(G)   | None [See c)(1)]<br><br>See b)(2)b.               |

(2) Additional Terms and Conditions

a. The permittee shall emit no more than 15.0 tons of OC per rolling, 12-month period from this emissions unit.

b. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: c)(1), d)(3), and e)(2).

c) Operational Restrictions

(1) The permittee shall not employ any cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

[OAC rule 3745-77-07(A)(1) and PTI #03-11125]



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for this emissions unit:
  - a. the company identification for each cleanup material employed;
  - b. the OC content of each cleanup material employed, in pounds per gallon;
  - c. the number of gallons of each cleanup material employed;
  - d. the number of gallons of each waste cleanup material sent off site for reclamation/disposal;
  - e. the total OC emission rate for all the cleanup materials employed [summation of  $b \times (c - d)$ ] for all cleanup materials], in pounds; and
  - f. the rolling, 12-month summation of the monthly OC emission rates, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-11125]

- (2) The permittee may also calculate the monthly OC emission rate in accordance with the following formula, for the emission rate required by Section d)(1)e., if waste cleanup materials are sent off site for reclamation/disposal:

$$\text{monthly OC emissions from cleanup operations (pounds/month)} = \text{summation of } [(A_i - B_i) \times d_i] \text{ for } i = 1 \text{ to } n$$

where:

$$i = 1, 2, 3, \dots, n$$

$n$  = the total number of different types of cleanup materials employed

$A_i$  = the number of gallons of cleanup material  $i$  consumed (gallons/month)

$B_i$  = the number of gallons of cleanup material  $i$  sent off site for disposal or reclamation, minus solids content of said material (gallons/month)

$d_i$  = density of cleanup material  $i$ , in pounds/gallon

[OAC rule 3745-77-07(C)(1) and PTI #03-11125]

- (3) The permittee shall record and maintain the following information each day for this emissions unit:
  - a. the company identification for each cleanup material employed; and
  - b. documentation on whether or not each cleanup material employed is a photochemically reactive material.

[OAC rule 3745-77-07(C)(1) and PTI #03-11125]



- (4) The permit to install for emissions units R001, R002, R005, R006, R008, R009 through R016, P001 through P006 and P901 was evaluated based on the actual materials (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: butyl Acetate  
 TLV (ug/m3): 950,000  
 Maximum Hourly Emission Rate (lbs/hr): 57.8  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 5,770  
 MAGLC (ug/m3): 22,620

Pollutant: methyl ethyl ketone  
 TLV (ug/m3): 590,000  
 Maximum Hourly Emission Rate (lbs/hr): 70.1  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 7,000  
 MAGLC (ug/m3): 14,048

Pollutant: isopropyl alcohol  
 TLV (ug/m3): 983,000  
 Maximum Hourly Emission Rate (lbs/hr): 20.6  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,060  
 MAGLC (ug/m3): 23,400

Pollutant: xylene  
 TLV (ug/m3): 434,000  
 Maximum Hourly Emission Rate (lbs/hr): 4.3  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 430  
 MAGLC (ug/m3): 10,333

[PTI #03-11125]

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports which identify the following information:
  - a. all exceedances of the rolling, 12-month OC emission limitation of 15 tons; and
  - b. all exceedance of the monthly OC emission limitation of 4.0 tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-11125]

- (2) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of any noncomplying cleanup



material (i.e., photochemically reactive cleanup material) in this emissions unit. 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 30 days after the exceedance occurs.

[OAC rule 3745-77-07(C)(1) and PTI #03-11125]

f) Testing Requirements

(1) Compliance with the emission limitations established in section b)(1) of this permit shall be determined in accordance with the following methods:

a. Emission Limitation: 15.0 tons OC per rolling, 12-month period

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section d)(1) of the terms and conditions of this permit.

b. Emission Limitation: 4.0 tons OC/month

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section d)(1) of the terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-11125]

(2) The permittee shall determine the OC contents of the cleanup materials based upon the formulation data supplied by the manufacturer of the cleanup materials, or from data determined by analysis of each cleanup material, as received, in accordance with 40 CFR Part 60, Appendix A, Method 24.

[OAC rule 3745-77-07(C)(1) and PTI #03-11125]

g) Miscellaneous Requirements

(1) None.



**2. R002, Master/Carrier Booth**

**Operations, Property and/or Equipment Description:**

The Mold Master Paint Booth is used to coat wood masters and polyurthane millwork

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

(1) d)(3)

b) Applicable Emissions Limitations and/or Control Requirements

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

|    | Applicable Rules/Requirements                                    | Applicable Emissions Limitations/Control Measures   |
|----|--|---|
| a. | OAC rule 3745-31-05(A)(3)<br>(PTI #03-11125, issued on 10/15/98) | 0.65 lb particulate emissions (PE)/hr, 3.25 lbs PE/day, 0.5 ton PE/yr [See b)(2)a.]<br><br>Visible PE shall not exceed 0% opacity, as a six-minute average<br><br>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2). |
| b. | OAC rule 3745-31-05(D)<br>(PTI #03-11125, issued on 10/15/98)    | See b)(2)b.   |
| c. | OAC rule 3745-17-07(A)   | See b)(2)c. and b)(2)e.   |
| d. | OAC rule 3745-17-11(B)   | See b)(2)d. and b)(2)e.   |
| e. | OAC rule 3745-17-11(C)   | See b)(2)f. and b)(2)g.   |
| f. | OAC rule 3745-21-07(G)(2)  | 8 lbs organic compounds (OC)/hr, 40 lbs OC/day<br><br>See b)(2)h.   |

(2) Additional Terms and Conditions

a. The PE, from emissions units R002 and R015 combined, shall not exceed 0.5 ton/yr.

b. The permittee shall emit no more than 6.5 tons of OC (from coatings), based upon a rolling, 12-month period from emissions units R002 and R015 combined.

c. This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.



- d. The uncontrolled mass rate of PE from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.
- e. The requirement to comply with this rule shall terminate on the date the U.S. EPA approves the requirement based on OAC rule 3745-17-11(C) as a revision to the Ohio State Implementation Plan (SIP) for particulate emissions.
- f. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.
- g. The permittee shall operate the dry particulate filter whenever this emissions unit is in operation.
- h. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(1)f., d)(1), e)(1)a., and e)(1)b.
- i. The OC emissions from the cleanup materials used in this emissions unit are permitted under emissions unit P901. Therefore, no record keeping and reporting requirements are necessary for the cleanup operations associated with this emissions unit.

c) Operational Restrictions

- (1) The permittee shall operate and maintain the dry particulate filter for the surface coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The dry particulate filter shall be employed during all periods of coating application to control particulate emissions.

[OAC rule 3745-77-07(A)(1) and PTI #03-11125]

- (2) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

[OAC rule 3745-77-07(A)(1) and PTI #03-11125]



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for this emissions unit:
  - a. the company identification for each coating employed;
  - b. the OC content of each coating employed, in pounds per gallon;
  - c. the number of gallons of each coating employed;
  - d. the total OC emission rate for all the coatings employed [summation of (b x c) for all coatings], in pounds;
  - e. the number of hours the emissions unit was in operation; and
  - f. the average hourly OC emission rate (d/e), in pounds/hr (average).

[OAC rule 3745-77-07(C)(1) and PTI #03-11125]

- (2) The permittee shall collect and record the following information each month for emissions units R002 and R015 combined:
  - a. the company identification for each coating employed;
  - b. the OC content of each coating employed, in pounds per gallon, as applied;
  - c. the solids content of each coating employed, in pounds per gallon;
  - d. the number of gallons of each coating employed;
  - e. the total OC emission rate for all the coatings employed [summation of (b x d) for all coatings], in tons;
  - f. the total coating solids usage rate for all the coatings employed [summation of (c x d) for all coatings], in tons; and
  - g. the rolling, 12-month summation of the monthly OC emission rates (input rates), in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-11125]

- (3) The permit to install for emissions units R001, R002, R005, R006, R008, R009 through R016, P001 through P006, and P901 was evaluated based on the actual materials (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: Butyl Acetate  
TLV (ug/m3): 950,000  
Maximum Hourly Emission Rate (lbs/hr): 57.8  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 5,770  
MAGLC (ug/m3): 22,620

Pollutant: methyl ethyl ketone  
TLV (ug/m3): 590,000  
Maximum Hourly Emission Rate (lbs/hr): 70.1  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 7,000  
MAGLC (ug/m3): 14,048

Pollutant: isopropyl alcohol  
TLV (ug/m3): 983,000  
Maximum Hourly Emission Rate (lbs/hr): 20.6  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,060  
MAGLC (ug/m3): 23,400

Pollutant: xylene  
TLV (ug/m3): 434,000  
Maximum Hourly Emission Rate (lbs/hr): 4.3  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 430  
MAGLC (ug/m3): 10,333

[PTI #03-11125]

- (4) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1)]

- (6) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-77-07(C)(1)]



- (7) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC rule 3745-77-07(C)(1)]

- (8) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer=s recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports which include the following information:
  - a. an identification of each day during which the average hourly OC emissions from the coatings exceed 8 pounds per hour, and the actual average hourly OC emissions for each such day;
  - b. an identification of each day during which the OC emissions from the coatings exceed 40 pounds per day, and the actual organic compound emissions for each such day; and
  - c. an identification of all exceedances of the rolling, 12-month OC emission limitation of 6.5 tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-11125]

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the dry particulate filter was not in service (normal operation) when the emissions unit was in operation. If there were no deviations from the requirements of this permit during the calendar quarter, the report shall so state that no deviations occurred during the reporting period. The quarterly deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.



[OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

(1) Compliance with the emission limitations established in section b)(1) of this permit shall be determined in accordance with the following methods:

a. Emission Limitation: 6.5 tons OC per rolling, 12-month period

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section d)(2) of the terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-11125]

b. Emission Limitations: 8 lbs OC/hr, 40 lbs OC/day

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section d)(1) of the terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-11125]

c. Emission Limitation: 0.65 lb PE/hr

Applicable Compliance Method: To determine the actual worst case particulate emissions rate (E), the following equation shall be used for the paint spraying operations:

$$E = \text{particulate emissions rate (lbs/hr)}$$

$$E = (\text{maximum coating solids usage rate, in pounds per hour}) \times (1-TE) \times (1-CE)$$

where:

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

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with the above emission limit pursuant to Methods 1-5 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #03-11125]

d. Emission Limitation: 3.25 lbs PE/day

Applicable Compliance Method: To determine the actual worst case particulate emissions rate (E), the following equation shall be used for the paint spraying operations:

$$E = \text{particulate emissions rate (lbs/day)}$$



$$E = (\text{maximum coating solids usage rate, in pounds per day}) \times (1-TE) \times (1-CE)$$

where:

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

CE = control efficiency of the control equipment

[OAC rule 3745-77-07(C)(1) and PTI #03-11125]

- e. Emission Limitation: Visible PE shall not exceed 0% opacity, as a six-minute average

Applicable Compliance Method: Compliance with the visible emission limitation shall be determined in accordance with Method 9 of 40 CFR Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #03-11125]

- f. Emission Limitation: 0.5 ton PE/yr (for emissions units R002 and R015 combined)

Applicable Compliance Method: The permittee shall determine compliance based upon the following equation:

$$E = \text{particulate emissions rate (tons/yr)}$$

$$E = [\text{coating solids usage rate (this is calculated by summing the 12 monthly coating solids usage rates, from section 2.f, for the calendar year), in tons per year}] \times (1-TE) \times (1-CE)$$

where:

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

CE = control efficiency of the control equipment

[OAC rule 3745-77-07(C)(1) and PTI #03-11125]

- g) Miscellaneous Requirements

- (1) None.



**3. Emissions Unit Group - Group 1: R005, R006, R016,**

| <b>EU ID</b> | <b>Operations, Property and/or Equipment Description</b>  |
|--------------|---|
| R005         | Exterior Booth #1 is used to spray urethane exterior millwork.                                  |
| R006         | Exterior Booth #2 is used to spray urethane exterior millwork.                                  |
| R016         | Exterior Booth #3 is used to paint polyurethane decorative millwork with a final white coating. |

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

(1) d)(3)

b) Applicable Emissions Limitations and/or Control Requirements

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

|    | <b>Applicable Rules/Requirements</b>                             | <b>Applicable Emissions Limitations/Control Measures</b>   |
|----|--|--|
| a. | OAC rule 3745-31-05(A)(3)<br>(PTI #03-11125, issued on 10/15/98) | <u>OC emissions from Exterior Booths:</u><br>For emissions unit R005: 17.5 lbs/hr and 76.7 tons/yr<br><br>For emissions unit R006: 17.5 lbs/hr and 76.7 tons/yr<br><br>For emissions unit R016: 48.0 lbs/hr<br><br><u>PE emissions from Exterior Booths:</u><br>For emissions unit R005: 0.65 lb/hr and 2.8 ton/yr<br><br>For emissions unit R006: 0.65 lb/hr and 2.8 ton/yr<br><br>For emissions unit: R016: 1.78 lbs/hr<br><br>See b)(2)a. |
| b. | OAC rule 3745-31-05(D)<br>(PTI #03-11125, issued on 10/15/98)    | See b)(2)b.  |
| c. | OAC rule 3745-17-07(A)   | See b)(2)c. and b)(2)e.  |
| d. | OAC rule 3745-17-11(B)   | See b)(2)d. and b)(2)e.  |
| e. | OAC rule 3745-17-11(C)   | See b)(2)f. and b)(2)g.  |
| f. | OAC rule 3745-21-07(G)   | None [See c)(1)]<br><br>See b)(2)h.  |



(2) Additional Terms and Conditions

- a. The PE, from emissions units R005, R006 and R016, combined, shall not exceed 3.6 tons/yr.
- b. The permittee shall emit no more than 80.0 tons of OC (from coatings), based upon a rolling, 12-month period from emissions units R005, R006 and R016, combined.
- c. These emissions units are exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- d. The uncontrolled mass rate of PE from these emissions units individually, are less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Williams County.
- e. The requirement to comply with this rule shall terminate on the date the U.S. EPA approves the requirement based on OAC rule 3745-17-11(C) as a revision to the Ohio State Implementation Plan (SIP) for particulate emissions.
- f. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.
- g. The permittee shall operate the dry particulate filter whenever this emissions unit is in operation.
- h. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: c)(1), d)(2), and e)(2).
- i. The OC emissions from the cleanup materials used in this emissions unit are permitted under emissions unit P901. Therefore, no record keeping and reporting requirements are necessary for the cleanup operations associated with this emissions unit.

c) Operational Restrictions

- (1) The permittee shall not employ any material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).



[OAC rule 3745-77-07(A)(1) and PTI #03-11125]

- (2) The permittee shall operate and maintain the dry particulate filter system for the surface coating operations in accordance with the manufacturer=s recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The dry particulate filter shall be employed during all periods of coating application to control particulate emissions.

[OAC rule 3745-77-07(A)(1)]

- (3) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

[OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units R005, R006 and R016 combined:
  - a. the company identification for each coating employed;
  - b. the OC content of each coating employed, in pounds per gallon, as applied;
  - c. the solids content of each coating employed, in pounds per gallon;
  - d. the number of gallons of each coating employed;
  - e. the total OC emission rate for all the coatings employed [summation of (b x d) for all coatings], in tons;
  - f. the total coating solids usage rate for all the coatings employed [summation of (c x d) for all coatings], in tons; and
  - g. the rolling, 12-month summation of the monthly OC emission rates (input rates), in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-11125]

- (2) The permittee shall record and maintain the following information each day for the coatings employed in this emissions unit:
  - a. the company identification for each material employed; and
  - b. documentation on whether or not each material employed is a photochemically reactive material.

[OAC rule 3745-77-07(C)(1) and PTI #03-11125]

- (3) The permit to install for emissions units R001, R002, R005, R006, R008, R009 through R016, P001 through P006, and P901 was evaluated based on the actual materials



(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: Butyl Acetate  
TLV (ug/m3): 950,000  
Maximum Hourly Emission Rate (lbs/hr): 57.8  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 5,770  
MAGLC (ug/m3): 22,620

Pollutant: methyl ethyl ketone  
TLV (ug/m3): 590,000  
Maximum Hourly Emission Rate (lbs/hr): 70.1  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 7,000  
MAGLC (ug/m3): 14,048

Pollutant: isopropyl alcohol  
TLV (ug/m3): 983,000  
Maximum Hourly Emission Rate (lbs/hr): 20.6  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,060  
MAGLC (ug/m3): 23,400

Pollutant: xylene  
TLV (ug/m3): 434,000  
Maximum Hourly Emission Rate (lbs/hr): 4.3  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 430  
MAGLC (ug/m3): 10,333

[PTI #03-11125]

- (4) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.



[OAC rule 3745-77-07(C)(1)]

- (6) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-77-07(C)(1)]

- (7) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC rule 3745-77-07(C)(1)]

- (8) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer=s recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month OC emission limitation of 80.0 tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-11125]

- (2) The permittee shall notify the Director (appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of any noncomplying coating (i.e., photochemically reactive material) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (appropriate Ohio EPA District Office or local air agency) within 30 days after the exceedance occurs.

[OAC rule 3745-77-07(C)(1) and PTI #03-11125]

- (3) The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the dry particulate filter was not in service (normal operation) when



the emissions unit was in operation. If there were no deviations from the requirements of this permit during the calendar quarter, the report shall so state that no deviations occurred during the reporting period. The quarterly deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

(1) Compliance with the emission limitations established in section b)(1) of this permit shall be determined in accordance with the following methods:

a. Emission Limitation: 80.0 tons OC per rolling, 12-month period for emission units R005, R006 and R0016 combined.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section d)(1) of the terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-11125]

b. Emission Limitation: 17.5 lbs OC/hr, 76.7 tons OC/yr

Applicable Compliance Method: Compliance with the hourly limitation shall be determined by multiplying the maximum coating usage rate (gallons/hr) by the maximum OC content of all the coatings (pounds/gallon), as applied.

If required, compliance with the hourly limitation shall be demonstrated pursuant to Methods 1-4 and 25 of 40 CFR Part 60, Appendix A.

Compliance with the annual limitation will be assumed as long as compliance with hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

[OAC rule 3745-77-07(C)(1) and PTI #03-11125]

c. Emission Limitations: 0.65 lb PE/hr, 2.8 tons PE/yr

Applicable Compliance Method: To determine the actual worst case particulate emissions rate (E), the following equation shall be used for the paint spraying operations:

$$E = \text{particulate emissions rate (lbs/hr)}$$

$$E = (\text{maximum coating solids usage rate, in pounds per hour}) \times (1-TE) \times (1-CE)$$

where:

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

CE = control efficiency of the control equipment



If required, the permittee shall demonstrate compliance with the above emission limit pursuant to Methods 1-5 of 40 CFR, Part 60, Appendix A.

The tons/yr limitation was developed by multiplying the 0.65 lb/hr limitation by 8760, and then dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

[OAC rule 3745-77-07(C)(1) and PTI #03-11125]

- d. Emission Limitation: 3.6 tons PE/yr (for emissions units R005, R006 and R016 combined)

Applicable Compliance Method: The permittee shall determine compliance based upon the following equation:

$$E = \text{particulate emissions rate (tons/yr)}$$

$$E = [\text{coating solids usage rate (this is calculated by summing the 12 monthly coating solids usage rates, from section 1.f, for the calendar year), in tons per year}] \times (1-TE) \times (1-CE)$$

where:

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

CE = control efficiency of the control equipment

[OAC rule 3745-77-07(C)(1) and PTI #03-11125]

- e. Emission Limitation: Visible PE shall not exceed 0% opacity, as a six-minute average

Applicable Compliance Method: Compliance with the visible emission limitation shall be determined in accordance with Method 9 of 40 CFR Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #03-11125]

- (2) The permittee shall determine the OC contents of the coatings based upon the formulation data supplied by the manufacturer of the coatings, or from data determined by analysis of each coating, as received, in accordance with 40 CFR Part 60, Appendix A, Method 24.

[OAC rule 3745-77-07(C)(1) and PTI #03-11125]

- g) Miscellaneous Requirements

- (1) None.



**4. Emissions Unit Group - Group 2: R008, R009, R010, R011, R012, R013, R014,**

| <b>EU ID</b> | <b>Operations, Property and/or Equipment Description</b>                                      |
|--------------|---|
| R008         | The activity performed in the foam line mold coating booth is the painting of silicone molds. |
| R009         | The activity performed in the foam line mold coating booth is the painting of silicone molds. |
| R010         | The activity performed in the foam line mold coating booth is the painting of silicone molds. |
| R011         | The activity performed in the foam line mold coating booth is the painting of silicone molds. |
| R012         | The activity performed in the foam line mold coating booth is the painting of silicone molds. |
| R013         | The activity performed in the foam line mold coating booth is the painting of silicone molds. |
| R014         | The activity performed in the foam line mold coating booth is the painting of silicone molds. |

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

(1) d)(3)

b) Applicable Emissions Limitations and/or Control Requirements

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

|    | Applicable Rules/Requirements                                    | Applicable Emissions Limitations/Control Measures   |
|----|--|---|
| a. | OAC rule 3745-31-05(A)(3)<br>(PTI #03-11125, issued on 10/15/98) | <u>OC emissions from Foam Line Booths:</u><br>For emissions units R008, R009, R010, R011, R012, R013 and R014 individually:<br>15.0 lbs/hr, 65.7 tons/yr<br><br><u>PE emissions from Foam Line Booths:</u><br>For emission units R008, R009, R010, R011, R012, R013 and R014 individually:<br>0.29 lbs/hr, 1.3 tons/yr<br><br>See b)(2)a. |
| b. | OAC rule 3745-31-05(D)<br>(PTI #03-11125, issued on 10/15/98)    | See b)(2)b.   |
| c. | OAC rule 3745-17-07(A)   | See b)(2)c. and b)(2)e.   |
| d. | OAC rule 3745-17-11(B)   | See b)(2)d. and b)(2)e.   |
| e. | OAC rule 3745-17-11(C)   | See b)(2)f. and b)(2)g.   |
| f. | OAC rule 3745-21-07(G)   | None [See c)(1)]<br><br>See b)(2)h.   |



(2) Additional Terms and Conditions

- a. The PE, from emissions units R008, R009, R010, R011, R012, R013 and R014 combined, shall not exceed 1.5 tons/yr.
- b. The permittee shall emit no more than 75.0 tons of OC (from coatings), based upon a rolling, 12-month period from emissions units R008, R009, R010, R011, R012, R013 and R014 combined.
- c. These emissions units are exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- d. The uncontrolled mass rate of PE from these emissions units individually, are less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Williams County.
- e. The requirement to comply with this rule shall terminate on the date the U.S. EPA approves the requirement based on OAC rule 3745-17-11(C) as a revision to the Ohio State Implementation Plan (SIP) for particulate emissions.
- f. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.
- g. The permittee shall operate the dry particulate filter whenever this emissions unit is in operation.
- h. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: c)(1), d)(2), and e)(2).
- i. The OC emissions from the cleanup materials used in this emissions unit are permitted under emissions unit P901. Therefore, no record keeping and reporting requirements are necessary for the cleanup operations associated with this emissions unit.

c) Operational Restrictions

- (1) The permittee shall not employ any material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).



[OAC rule 3745-77-07(A)(1) and PTI #03-11125]

- (2) The permittee shall operate and maintain the dry particulate filter system for the surface coating operations in accordance with the manufacturer=s recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The dry particulate filter shall be employed during all periods of coating application to control particulate emissions.

[OAC rule 3745-77-07(A)(1)]

- (3) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

[OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units R008, R009, R010, R011, R012, R013 and R014 combined:

- a. the company identification for each coating employed;
- b. the OC content of each coating employed, in pounds per gallon, as applied;
- c. the solids content of each coating employed, in pounds per gallon;
- d. the number of gallons of each coating employed;
- e. the total OC emission rate for all the coatings employed [summation of (b x d) for all coatings], in tons;
- f. the total coating solids usage rate for all the coatings employed [summation of (c x d) for all coatings], in tons; and
- g. the rolling, 12-month summation of the monthly OC emission rates (input rates), in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-11125]

- (2) The permittee shall record and maintain the following information each day for the coatings employed in this emissions unit:

- a. the company identification for each material employed; and
- b. documentation on whether or not each material employed is a photochemically reactive material.

[OAC rule 3745-77-07(C)(1) and PTI #03-11125]

- (3) The permit to install for emissions units R001, R002, R005, R006, R008, R009 through R016, P001 through P006, and P901 was evaluated based on the actual materials



(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: Butyl Acetate  
TLV (ug/m3): 950,000  
Maximum Hourly Emission Rate (lbs/hr): 57.  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 5,770  
MAGLC (ug/m3): 22,620

Pollutant: methyl ethyl ketone  
TLV (ug/m3): 590,000  
Maximum Hourly Emission Rate (lbs/hr): 70.1  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 7,000  
MAGLC (ug/m3): 14,048

Pollutant: isopropyl alcohol  
TLV (ug/m3): 983,000  
Maximum Hourly Emission Rate (lbs/hr): 20.6  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,060  
MAGLC (ug/m3): 23,400

Pollutant: xylene  
TLV (ug/m3): 434,000  
Maximum Hourly Emission Rate (lbs/hr): 4.3  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 430  
MAGLC (ug/m3): 10,333

[PTI #03-11125]

- (4) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC rule 3745-77-07(C)(1)]

- (5) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.



[OAC rule 3745-77-07(C)(1)]

- (6) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-77-07(C)(1)]

- (7) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC rule 3745-77-07(C)(1)]

- (8) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer=s recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month OC emission limitation of 75.0 tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-11125]

- (2) The permittee shall notify the Director (appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of any noncomplying coating (i.e., photochemically reactive material) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (appropriate Ohio EPA District Office or local air agency) within 30 days after the exceedance occurs.

[OAC rule 3745-77-07(C)(1) and PTI #03-11125]

- (3) The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the dry particulate filter was not in service (normal operation) when



the emissions unit was in operation. If there were no deviations from the requirements of this permit during the calendar quarter, the report shall so state that no deviations occurred during the reporting period. The quarterly deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

(1) Compliance with the emission limitations established in section b)(1) of this permit shall be determined in accordance with the following methods:

a. Emission Limitation: 75.0 tons OC per rolling, 12-month period (for emissions units R008, R009, R010, R011, R012, R013 and R014 combined)

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in section d)(1) of the terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-11125]

b. Emission Limitation: 15 lbs OC/hr, 65.7 tons OC/yr

Applicable Compliance Method: Compliance with the hourly limitation shall be determined by multiplying the maximum coating usage rate (gallons/hr) by the maximum OC content of all the coatings (pounds/gallon), as applied.

If required, compliance with the hourly limitation shall be demonstrated pursuant to Methods 1-4 and 25 of 40 CFR Part 60, Appendix A.

Compliance with the annual limitation will be assumed as long as compliance with hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

[OAC rule 3745-77-07(C)(1) and PTI #03-11125]

c. Emission Limitations: 0.29 PE/hr, 1.3 tons PE/yr

Applicable Compliance Method: To determine the actual worst case particulate emissions rate (E), the following equation shall be used for the paint spraying operations:

E = particulate emissions rate (lbs/hr)

E = (maximum coating solids usage rate, in pounds per hour) X (1-TE) X (1-CE)

where:

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

CE = control efficiency of the control equipment



If required, the permittee shall demonstrate compliance with the above emission limit pursuant to Methods 1-5 of 40 CFR, Part 60, Appendix A.

The tons/yr limitation was developed by multiplying the 0.29 lb/hr limitation by 8760, and then dividing by 2000. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

[OAC rule 3745-77-07(C)(1) and PTI #03-11125]

- d. Emission Limitation: 1.5 tons PE/yr (for emissions units R008, R009, R010, R011, R012, R013 and R014 combined)

Applicable Compliance Method: The permittee shall determine compliance based upon the following equation:

$E = \text{particulate emissions rate (tons/yr)}$

$E = [\text{coating solids usage rate (this is calculated by summing the 12 monthly coating solids usage rates, from section 1.f, for the calendar year), in tons per year}] \times (1-TE) \times (1-CE)$

where:

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

CE = control efficiency of the control equipment

[OAC rule 3745-77-07(C)(1) and PTI #03-11125]

- e. Emission Limitation: Visible PE shall not exceed 0% opacity, as a six-minute average

Applicable Compliance Method: Compliance with the visible emission limitation shall be determined in accordance with Method 9 of 40 CFR Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #03-11125]

- (2) The permittee shall determine the OC contents of the coatings based upon the formulation data supplied by the manufacturer of the coatings, or from data determined by analysis of each coating, as received, in accordance with 40 CFR Part 60, Appendix A, Method 24.

[OAC rule 3745-77-07(C)(1) and PTI #03-11125]

- g) Miscellaneous Requirements

- (1) None.