



State of Ohio Environmental Protection Agency

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Lazarus Government Center
50 W. Town St., Suite 700
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P.O. Box 1049
Columbus, OH 43216-1049

2/23/2009

Certified Mail

Sue Ahrmann
YUSA CORPORATION
151 Jamison Rd. SW
Washington C.H., OH 43160

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0124010098
Permit Number: P0103947
Permit Type: Initial Installation
County: Fayette

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

Dear Permit Holder:

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

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

and Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778.

Sincerely,

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

Cc: U.S. EPA
Ohio EPA-CDO; Kentucky

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

PUBLIC NOTICE
Issuance Of Draft Air Pollution Permit-To-Install
YUSA CORPORATION

Issue Date: 2/23/2009

Permit Number: P0103947

Permit Type: Initial Installation

Permit Description: Installation of seven new adhesive application machines. Synthetic minor restrictions to use an RTO with PTE are necessary to restrict VOC potential emissions below major NSR thresholds.

Facility ID: 0124010098

Facility Location: YUSA CORPORATION
151 Jamison Rd. SW,
Washington Court House, OH 43160

Facility Description: Motor Vehicle Steering and Suspension Components (except Spring) 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 permit-to-install (PTI) for an air contaminant source at the location identified above on the date indicated. Installation of the air contaminant source may proceed upon final issuance of the PTI. 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 Benjamin Halton at Ohio EPA DAPC, Central District Office, 50 West Town Street, 6th Floor P.O. Box 1049 or (614)728-3778. The permit can be downloaded from the Web page: www.epa.state.oh.us/dapc



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Proposed installation of 7 new adhesive application machines (K061, K062, K063, K064, K065, K066 and K067). Each line consists of the application of a primer followed by an electric dryer followed by the application of a cover-coat followed by another electric dryer. The spray application for each of these units will take place within a permanent total enclosure that vents all VOC emissions to a regenerative thermal oxidizer. Particulate emissions are controlled through the use of a dry filtration system. The units are considered as part of the affected source with respect to 40 CFR Part 63, subpart M for Surface Coating of Miscellaneous Metal Parts. The requirement to operate the RTO is necessary to avoid Major NSR for VOC and may be necessary to demonstrate compliance with the applicable requirements of subpart M (the facility has chosen the “emissions rate with add-on controls” option for demonstrating compliance with the M subpart and may use the control efficiency of the RTO if all of the subpart requirements are met).

3. Facility Emissions and Attainment Status:

YUSA Corporation is a Title V facility located within Fayette County. Fayette County is designated as “Attainment” for all criteria pollutants regulated under the CAA. The installation of these seven coating operations represents a 4.71 TPY VOC increase in potential emissions for the facility. The following table identifies the potential particulate and VOC emissions before and after controls:

Major NSR Applicability

	Uncontrolled (tpy)		Controlled (tpy)	
	VOC	PE	VOC	PE
K061	27.40	1.84	0.27	0.092
K062	71.49	0.59	0.71	0.029
K063	80.69	7.69	0.81	0.385
K064	29.39	2.34	0.29	0.117
K065	22.17	2.87	0.22	0.144
K066	71.49	5.28	0.71	0.264
K067	170.47	12.20	1.70	0.610
Total	473.05	32.81	4.71	1.64

As identified in the table above, use of the PTE and RTO are necessary to limit VOC emissions below Major NSR thresholds.

BAT Applicability

	VOC controlled (tpy)	PE controlled (tpy)	NO _x (tpy)	SO ₂ (tpy)	CO (tpy)
RTO	0.18	0.26	3.65	0.022	3.05
K061	0.27	0.092			
K062	0.71	0.029			
K063	0.81	0.385			



K064	0.29	0.117	
K065	0.22	0.144	
K066	0.71	0.264	
K067	1.70	0.610	

Emissions from the combustion of natural gas in the RTO were calculated using AP-42 emissions factors from table 1.4-1 for an 8.5 MMBtu burner. As identified in the table above, the uncontrolled potential NO_x, SO₂ and CO emissions are below 10 tpy and therefore BAT does not apply and the controlled potential emissions for particulate and VOCs (for the RTO emissions combined with any individual EU emissions) are also below 10 tpy and therefore BAT does not apply.

4. Source Emissions:

The following table identifies the controlled particulate emissions from each EU used to determine compliance with OAC 3745-17-11(B):

	Application Rate (gal/hr)		Solids Content (% volume)		Solid Density (lbs/gal)		Transfer Efficiency	Control Efficiency	PE (lb s/hr)
	C205	C6225	C205	C6225	C205	C6225			
K061	0.24	0.21	0.1365	0.1622	14.77	13.20	55%	95%	.021
K062	0.66	0.62	0.1365	0.1622	14.77	13.20	95%	95%	.007
K063	0.74	0.67	0.1365	0.1622	14.77	13.20	40%	95%	.088
K064	0.36	0.21	0.1365	0.1622	14.77	13.20	55%	95%	.027
K065	0.34	0.29	0.1365	0.1622	14.77	13.20	50%	95%	.033
K066	0.66	0.62	0.1365	0.1622	14.77	13.20	55%	95%	.060
K067	1.52	1.44	0.1365	0.1622	14.77	13.20	55%	95%	.138

The following tables identify the controlled hourly VOC emissions from each EU and the hourly solids consumed used to determine compliance with OAC 3745-21-09(U)(1)(i):

	Coatings VOC rate (lb/hr)		Thinners VOC rate (lb/hr)		Combined VOC rate (lb/hr)	Control Efficiency	Controlled VOC (lb/hr)
	C205	C6225	MIBK	Toluene			
K061	1.40	1.26	1.97	1.63	6.26	99%	.063
K062	3.86	3.77	4.27	4.42	16.32	99%	.163
K063	4.32	4.01	2.75	7.34	18.42	99%	.184
K064	2.11	1.28	1.31	2.01	6.71	99%	.067
K065	1.99	1.75	0.51	0.81	5.06	99%	.051
K066	3.86	3.77	4.27	4.42	16.32	99%	.163
K067	8.91	8.71	10.65	10.65	38.92	99%	.389

	Application Rate (gal/hr)		Solids Content (% volume)		Total solids (gal/hr)	Controlled VOC (lb/hr)	Max VOC/gal coating solids
	C205	C6225	C205	C6225			
K061	0.24	0.21	0.1365	0.1622	.07	.063	0.90
K062	0.66	0.62	0.1365	0.1622	.19	.163	0.86



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Permit Strategy Write-Up
Permit Number: P0103947
Facility ID: 0124010098

K063	0.74	0.67	0.1365	0.1622	.21	.184	0.88
K064	0.36	0.21	0.1365	0.1622	.08	.067	0.84
K065	0.34	0.29	0.1365	0.1622	.09	.051	0.57
K066	0.66	0.62	0.1365	0.1622	.19	.163	0.86
K067	1.52	1.44	0.1365	0.1622	.44	.389	0.88

5. Conclusion:

The terms and conditions contained within PTI P0103947 are sufficient to ensure compliance with all state and federal regulations.

6. Please provide additional notes or comments as necessary:
None

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	4.71
PE	16.89



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

DRAFT

**Air Pollution Permit-to-Install
for
YUSA CORPORATION**

Facility ID: 0124010098
Permit Number: P0103947
Permit Type: Initial Installation
Issued: 2/23/2009
Effective: To be entered upon final issuance



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install
for
YUSA CORPORATION

Table of Contents

Authorization 1

A. Standard Terms and Conditions 3

 1. Federally Enforceable Standard Terms and Conditions 4

 2. Severability Clause 4

 3. General Requirements 4

 4. Monitoring and Related Record Keeping and Reporting Requirements 5

 5. Scheduled Maintenance/Malfunction Reporting 6

 6. Compliance Requirements 6

 7. Best Available Technology 7

 8. Air Pollution Nuisance 7

 9. Reporting Requirements 7

 10. Applicability 8

 11. Construction of New Sources(s) and Authorization to Install 8

 12. Permit-To-Operate Application 9

 13. Construction Compliance Certification 9

 14. Public Disclosure 9

 15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations 9

 16. Fees 9

 17. Permit Transfers 10

 18. Risk Management Plans 10

 19. Title IV Provisions 10

B. Facility-Wide Terms and Conditions 11

C. Emissions Unit Terms and Conditions 13

 1. Emissions Unit Group - Adhesive Applicators K061-K067: K061, K062, K063, K064, K065, K066, K067, 14



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: P0103947

Facility ID: 0124010098

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0124010098

Facility Description: Motor vehicle parts and accessories

Application Number(s): A0035997, A0036408

Permit Number: P0103947

Permit Description: Installation of seven new adhesive application machines. Synthetic minor restrictions to use an RTO with PTE are necessary to restrict VOC potential emissions below major NSR thresholds.

Permit Type: Initial Installation

Permit Fee: \$1,400.00 *DO NOT send payment at this time, subject to change before final issuance*

Issue Date: 2/23/2009

Effective Date: To be entered upon final issuance

This document constitutes issuance to:

YUSA CORPORATION
151 Jamison Rd. SW
Washington Court House, OH 43160

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

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

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



Authorization (continued)

Permit Number: P0103947
Permit Description: Installation of seven new adhesive application machines. Synthetic minor restrictions to use an RTO with PTE are necessary to restrict VOC potential emissions below major NSR thresholds.

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

Group Name: Adhesive Applicators K061-K067

Emissions Unit ID:	K061
Company Equipment ID:	Top Hat Adhesive M/C
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K062
Company Equipment ID:	Straight Outer Pipe
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K063
Company Equipment ID:	MT Bracket/T-Rod M/C
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K064
Company Equipment ID:	Upper Bracket/Mushrm
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K065
Company Equipment ID:	Flex A Inner Pipe
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K066
Company Equipment ID:	Straight Outer Pipe2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K067
Company Equipment ID:	Stopper Bracket
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: P0103947

Facility ID: 0124010098

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. 2.a), Severability Clause
 - (2) Standard Term and Condition A. 3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A. 6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A. 9., Reporting Requirements
 - (5) Standard Term and Condition A. 10., Applicability
 - (6) Standard Term and Condition A. 11.b) through A. 11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A. 14., Public Disclosure
 - (8) Standard Term and Condition A. 15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A. 16., Fees
 - (10) Standard Term and Condition A. 17., Permit Transfers

2. Severability Clause

- a) 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.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. 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 re-issuance, or modification.



- 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, revoked, or revoked and reissued, for cause. 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 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.

4. 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, 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.
- 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, 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.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Central District Office.



(2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Central District Office. The written 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. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Central District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. 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 are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Central District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

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

b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this 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.

c) 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 ORC section 3704.08.
 - (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.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Central District Office 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.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. 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.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Central District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Central District Office. 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.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized 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 authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed through completion of the annual PER covering the last period of operation of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the PER covering the last period the emissions unit operated.



No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a PER, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

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

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

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 quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: P0103947

Facility ID: 0124010098

Effective Date: To be entered upon final issuance

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Central District Office must be notified in writing of any transfer of this permit.

18. Risk Management Plans

If the permittee is required to 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"), the permittee shall comply with the requirement to register such a plan.

19. 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.



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B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

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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) None.



State of Ohio Environmental Protection Agency
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C. Emissions Unit Terms and Conditions



1. Emissions Unit Group - Adhesive Applicators K061-K067: K061, K062, K063, K064, K065, K066, K067,

EU ID	Operations, Property and/or Equipment Description
K061	Top Hat Adhesive Application Machine vented to an RTO
K062	Straight Outer Pipe Adhesive Application Machine #1 vented to an RTO
K063	MT Bracket/T-Rod Adhesive Application Machine vented to an RTO
K064	Upper Bracket/(Mushroom) Adhesive Application Machine vented to an RTO
K065	Flex A Inner Pipe Spray Adhesive Application Machine vented to an RTO
K066	Maskless Straight Outer Pipe Adhesive Application Machine #2 vented to an RTO
K067	Stopper Bracket/Heavy Weight Adhesive Application Machine vented to an RTO

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
- (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
- (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	Ohio Administrative Code (OAC) rule 3745-31-05(A)(3)(a)(ii)	See b)(2)a and b)(2)b below.
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid PSD)	The combined volatile organic compounds (VOC) emissions from emissions units K061, K062, K063, K064, K065, K066 and K067 shall not exceed 4.71 tons per rolling, 12-month period. See c)(1) and c)(2) below.
c.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
d.	OAC rule 3745-17-11(B)	PE shall not exceed 0.551 lbs/hour. See b)(2)c below.
e.	OAC rule 3745-17-11(C)	See b)(2)d, b)(2)e, c)(3) and c)(4) below.
f.	OAC rule 3745-21-09(U)(1)(i)	VOC emissions shall not exceed 5.1 pounds per gallon of coating solids.
g.	40 CFR Part 63, Subpart M	See b)(2)f below.
h.	40 CFR Part 63, Subpart A (40 CFR Part 63.1-16)	See b)(2)g below.



(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05 (A)(3) do not apply to the particulate emissions (PE), carbon monoxide (CO), sulfur dioxide (SO₂), nitrogen oxides (NO_x) and VOC emissions related to the combustion of natural gas in the RTO serving this emissions unit because the potential to emit for each of these pollutants is less than ten tons per year (TPY).
- b. The BAT requirements under OAC rule 3745-31-05 (A)(3) do not apply to the PE and VOC emissions from this air contaminant source because the potential to emit, taking into account air pollution controls installed on the source, for each of these pollutants is less than ten tons per year (TPY).
- c. The hourly PE limitation established by this rule is greater than the potential to emit for this emissions unit as vented to dry filtration. Therefore it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.
- d. 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.
- e. The permittee shall install and operate a dry particulate filter system whenever this emissions unit is in operation.
- f. The emissions limitations that apply to this emissions unit are identified in 40 CFR Part 63.3890 and are determined to be:
 - i. For each existing rubber-to-metal coating affected source, limit organic HAP emissions to 37.7 lbs per gallon of coating solids used during each 12-month compliance period.

The permittee has elected to use the "emission rate with add-on controls option" to comply with this limitation. Existing coating operations at the facility are controlled by two thermal oxidizers. Per the MACT, a facility may use this option "for any coating operation, for any group of coating operations in the affected source, or for all of the coating operations in the affected source. The permittee may include both controlled and uncontrolled coating operations in a group for which the permittee uses this option." The affected sources considered in the compliance determination will be the collection of equipment, activities, or both, within a single contiguous area and under common control. The permittee must demonstrate that the total of all adhesives and solvents used, in sources throughout the facility that are subject to 40 CFR Part 63, Subpart M, meet the overall emission limitations after applying emissions reductions achieved by emission capture systems and add-on controls.



- g. Table 2 to subpart MMMM of 40 CFR Part 63 - "Applicability of General Provisions to Subpart MMMM of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.

c) Operational Restrictions

- (1) All of the VOC emissions from this emissions unit shall be vented to an RTO with a minimum overall control efficiency of 99%.
- (2) The permittee shall employ a permanent total enclosure (PTE) to ensure that all VOC emissions are captured, contained, and directed to the control device. The PTE shall be maintained in accordance with 40 CFR Part 63, subpart MMMM.
- (3) The permittee shall install, operate, and maintain a 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.
- (4) 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.
- (5) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM (40 CFR Part 63.3880-3981).

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification number for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the VOC content of each coating and cleanup material, in pounds per gallon;
 - d. the total VOC emissions, in tons;
 - e. the combined VOC emissions, in tons, from emissions units K061, K062, K063, K064, K065, K066 and K067; and
 - f. the combined, rolling, 12-month VOC emissions, in tons, from emissions units K061, K062, K063, K064, K065, K066 and K067.
- (2) The permittee shall collect and record the following information each day for this emissions unit:
 - a. the name and identification number of each coating used;



- b. the mass of VOC per unit volume of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating;
 - c. the maximum VOC content (mass of VOC per unit volume of coating solids, as applied) or the daily volume-weighted average VOC content (mass of VOC per unit volume of coating solids, as applied) of all of the coatings; and
 - d. The calculated, controlled VOC emission rate, in mass of VOC per unit volume of coating solids, as applied. The controlled VOC emission rate shall be calculated using (a) either the maximum VOC content or the daily volume-weighted VOC content recorded in accordance with d)(2)c above and (b) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the source was in compliance.
- (3) 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.
- (4) 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.
- (5) 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.
- (6) 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.

- (7) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were 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.



- (8) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer=s recommendations, instructions, and the operating manuals. The acceptable temperature setting shall be based upon the manufacturer=s specifications until such time as any required emission testing is conducted and the appropriate temperature range is established to demonstrate compliance. Following compliance testing, the permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:
- a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent emissions test that demonstrated the emissions unit(s) was/were in compliance; and
 - b. a log or record of the operating time for the capture (collection) system, thermal oxidizer, monitoring equipment, and the associated emissions unit(s).

These records shall be maintained at the facility for a period of three years.

- (9) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent emissions test that demonstrated the emissions unit(s) was/were in compliance. Until compliance testing has been conducted, the thermal oxidizer shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manual.
- (10) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
- a. the date and time the deviation began;
 - b. the magnitude of the deviation at that time;
 - c. the date the investigation was conducted;
 - d. the name(s) of the personnel who conducted the investigation; and
 - e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee



determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- a. a description of the corrective action;
- b. the date corrective action was completed;
- c. the date and time the deviation ended;
- d. the total period of time (in minutes) during which there was a deviation;
- e. the temperature readings immediately after the corrective action was implemented; and
- f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future emission tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (11) The permittee shall comply with the applicable monitoring and recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM (40 CFR part 63.3880-3981).

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer=s recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were 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.
- (2) The permittee shall submit quarterly summaries of the following records:
 - a. each period of time (start time and date, and end time and date) when the average combustion temperature within the thermal oxidizer was outside of the range specified by the manufacturer and/or outside of the acceptable range following any required compliance demonstration;
 - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the thermal oxidizer;



- c. each incident of deviation described in Aa@ or “b” (above) where a prompt investigation was not conducted;
- d. each incident of deviation described in Aa@ or “b” where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken; and
- e. each incident of deviation described in Aa@ or “b” where proper records were not maintained for the investigation and/or the corrective action(s).
- f. all deviations from the following restricted, federally enforceable emission limitation(s), operational restriction(s), and/or other control device operating parameter limitation(s) that restrict the pollutant’s(s’) Potential to Emit (PTE) and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. each period of time during which all VOC emissions from this emissions were not vented to an RTO with a minimum overall control efficiency of 99%;
 - ii. each period of time during which the VOC emissions from this emissions unit were not captured, contained and directed to the control device through the use of a PTE; and
 - iii. each rolling, 12-month period during which the combined VOC emissions, from emissions units K061, K062, K063, K064, K065, K066 and K067 exceeded 4.71 tons.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

- (3) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart M (40 CFR Part 63.3880-3981).

f) Testing Requirements

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

a. Emissions Limitation:

The combined VOC emissions from emissions units K061, K062, K063, K064, K065, K066 and K067 shall not exceed 4.71 tons per rolling, 12-month period.

Applicable Compliance Method:

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

b. Emissions Limitation:

VOC emissions shall not exceed 5.1 pounds per gallon of coating solids.



Compliance Method:

Compliance shall be based upon the record keeping specified in d)(2) and the following equation:

$$E = [VOC/(M*S*T)]*[1-CE]$$

where:

E = maximum emissions (lb VOC/gallon of solid)

VOC = maximum total VOC emissions for all coatings and thinners (lb/hr)

M = maximum coating application rate (gal/hr)

S = Solids content (percent by volume)

T = Transfer efficiency

CE = RTO control efficiency

If more than one coating is applied in this emissions unit then the above calculation should be adjusted to account for multiple solids contents, multiple coating application rates and combined total VOC emissions.

c. Emissions Limitation:

PE shall not exceed 0.551 lbs/hour.

Compliance Method:

Compliance shall be based upon the following equation:

$$PE = (M*S*D)*(1-T)*(1-CE)$$

where:

PE = maximum particulate emissions (lb /hr)

M = maximum coating application rate (gal/hr)

S = Solids content (percent by volume)

D = solids density (lb/gal)

T = Transfer efficiency

CE = Particulate filter control efficiency

If more than one coating is applied in this emissions unit then the above calculation should be adjusted to account for multiple solids contents, solids densities and coating application rates.



d. Emissions Limitation:

Visible particulate emissions (PE) from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

e. Emission Limitation:

37.7 lbs HAP/gal coating solids used during each 12-month compliance period.

Compliance Method:

Compliance shall be determined in accordance with the requirements of 40 CFR Part 63, Subpart M.

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

- a. The emission testing shall be conducted within 3 months after start-up;
- b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for volatile organic compounds;
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Method 18, Method 25 or Method 25A of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency;
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s);
- f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit



and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment; and

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

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

(4) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

(5) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart M (40 CFR Part 63.3880-3981).

g) Miscellaneous Requirements

(1) None.