



State of Ohio Environmental Protection Agency

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Columbus, Ohio 43215

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Columbus, OH 43216-1049

4/1/2009

David Stoltenberg  
Honeywell Lighting and Electronics  
550 State Rte 55  
Urbana, OH 43078

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 0511010009  
Permit Number: P0104612  
Permit Type: Administrative Modification  
County: Champaign

Certified Mail

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

Dear Permit Holder:

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

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

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

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

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

Sincerely,

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

Cc: Ohio EPA-SWDO

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





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

**FINAL**

**Air Pollution Permit-to-Install and Operate  
for  
Honeywell Lighting and Electronics**

Facility ID: 0511010009  
Permit Number: P0104612  
Permit Type: Administrative Modification  
Issued: 4/1/2009  
Effective: 4/1/2009  
Expiration: 4/1/2014





State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Air Pollution Permit-to-Install and Operate**  
for  
Honeywell Lighting and Electronics

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**Final Permit-to-Install and Operate**  
**Permit Number:** P0104612  
**Facility ID:** 0511010009  
**Effective Date:** 4/1/2009

# Authorization

Facility ID: 0511010009  
Application Number(s): M0000414  
Permit Number: P0104612  
Permit Description: To correct ST&C's  
Permit Type: Administrative Modification  
Permit Fee: \$0.00  
Issue Date: 4/1/2009  
Effective Date: 4/1/2009  
Expiration Date: 4/1/2014  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Honeywell Lighting and Electronics  
550 STATE RTE 55  
Urbana, OH 43078

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski  
Director



State of Ohio Environmental Protection Agency  
 Division of Air Pollution Control

**Final Permit-to-Install and Operate**

**Permit Number:** P0104612

**Facility ID:** 0511010009

**Effective Date:** 4/1/2009

## Authorization (continued)

Permit Number: P0104612  
 Permit Description: To correct ST&C's

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

<b>Emissions Unit ID:</b>	<b>K011</b>
Company Equipment ID:	Urethane Swirl Coating Operation: Metal, Plastic, and circui
Superseded Permit Number:	.
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K012</b>
Company Equipment ID:	Silicone Swirl Coating Operation: Metal, Plastic, and circui
Superseded Permit Number:	.
General Permit Category and Type:	Not Applicable



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**Permit Number:** P0104612

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



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

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

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

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

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

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

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

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

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

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

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

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

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

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.



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

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

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

**7. What reports must I submit under this permit?**

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

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

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

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

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

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



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

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

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

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

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

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

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

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

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

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

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

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



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change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

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

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

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

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



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



State of Ohio Environmental Protection Agency  
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**Final Permit-to-Install and Operate**

**Permit Number:** P0104612

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**Effective Date:** 4/1/2009

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.



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**Effective Date:** 4/1/2009

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



**1. K011, Urethane swirl**

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

Urethane Swirl Coating Operation: Metal, Plastic, and circuit board coating

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. None.
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(1)a., b)(1)b., d)(2), d)(3), e)(1), f)(1)a., and f)(1)b.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) (to avoid Title V requirements for HAP(s) emissions)	The total HAP emissions from all emissions units at this facility, including emissions from existing units not listed or specifically addressed in this permit, shall not exceed 7.5 tons per rolling 12 month period for any single HAP and 22.5 tons per rolling 12 month period for any combinations of HAPs, based upon a rolling, 12-month summation of the monthly emissions.  See Sections d)(3), e)(1), and f)(1)b., below.
b	OAC rule 3745-31-05(F)	9.9 tons OC per rolling 12 month period  See Sections d)(2), e)(1), and f)(1)a., below
c.	OAC rule 3745-31-05(A)(3)(a)(ii)	See Section b)(2)a., below.
d.	OAC rule 3745-21-09(U)(2)	See Sections c)(1), d)(1), and e)(2), below.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-17-11(A)(1)(i)	b)(2)b
f.	40 CFR 63, Subpart HHHHHH	b)(2)c
g.	OAC rule 3745-21-07(G)(2)	When coating non-metal parts, the OC emissions from the use photochemically reactive liquid organic materials or substance containing photochemically reactive material shall not exceed 8 pounds per hour nor 40 pounds per day.  See Sections b)(2)d, d)(4), e)(2), and f)(3), below.
h.	OAC rule 3745-114-01	Ohio Toxic Rule  See Section d)(6), 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), volatile organic compound (VOC), and organic compound (OC) emissions from this emissions unit since the potential emissions for each pollutant are less than ten (10) tons per year.
- b. This emissions unit is not subject to the requirements established by OAC rule 3745-17-11 as long as the permittee maintains coating usage records, coating purchase records and/or coating production records that demonstrate the actual coating usage is less than five gallons per day.
- c. This emissions unit is exempt from the requirements of 40 CFR 63 Subpart HHHHHH, because the operation utilizes only automated coating applicators.
- d. On February 18, 2008, OAC rule 3745-21-07 was revised to delete paragraph (G); therefore, paragraph (G) is no longer part of the State regulations. However, that rule revision has not been approved by the U.S.EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs to OAC rule 3745-21-07, the requirement of the previous OAC rule 3745-21-07(G) still exists as part of the federally approved SIP for Ohio.

Once the February 18, 2008, revised OAC rule 3745-21-07, or modified version of OAC rule 3745-21-07 is approved by the U.S. EPA and Ohio's State Implementation Plan (SIP) is revised, the terms and conditions within this permit which are required by previous OAC rule 3745-21-07(G) will not be required and will not be federally and/or state enforceable.

Once the February 18, 2008, revised OAC rule 3745-21-07, or modified version of OAC rule 3745-21-07 is approved by the U.S. EPA and Ohio's State Implementation Plan (SIP) is revised, the permittee shall take immediate steps to



assure compliance with any and all requirements of the revised OAC rule and/or SIP.

c) Operational Restrictions

- (1) The amount of coating employed in this emissions unit shall not exceed 10 gallons per day, when coating metal parts, including any added thinners and reducers, as applied.

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; and
- b. the number of gallons of each coating employed.

- (2) The permittee shall maintain the following monthly records on the material employed in this emissions unit:

- a. the company identification for each coating and clean-up material employed;
- b. the number of gallons of each coating and clean-up material employed. The clean-up material employed may be based on purchasing records or actual usage tracking;
- c. the VOC/OC content of each coating and clean-up material, in pounds per gallon, as applied;
- d. the total combined VOC/OC generated by all coatings and clean-up materials employed, in tons per month;
- e. the amount of clean-up material recovered, in gallons;
- f. the VOC/OC content of recovered clean-up material, in percent by volume;
- g. the estimated amount of clean-up material recovered, in gallons, (the summation of: ("e" x "f");
- h. the total amount of VOC/OC material recovered, in tons per month, (the summation of: [("g" x 7.51 pounds of gallon\*)/ 2000]);
- i. the total combined monthly VOC/OC emissions, in tons per month, (the summation of: ("d" - "h"); and
- j. the total combined rolling, 12-month summation VOC/OC emissions, in tons. The rolling, 12-month summation of the total VOC/OC emissions (the total amount of VOC/OC emissions for the current month ("i") plus the total amount of VOC/OC emissions for the 11 previous calendar months).

\* This assumed VOC/OC content of 7.51 pounds per gallon is based on the lowest VOC/OC content of the clean-up solvents that will be employed at this facility, which were listed in the PTI application. This assumption represents the worst case emissions



as based on the facility's application. **VOC/OC emission rates calculated based on purchasing records are assumed to represent the worst case actual emissions and may be used to demonstrate compliance with the above list VOC/OC emission limitations, in section b)(1).**

- (3) The permittee shall collect and record the following information each month for all emissions units at this facility, including emissions from units not listed or specifically addressed in this permit:
- a. the company identification for each HAP-emitting material (i.e., all HAP-containing coatings, clean-up materials, resins, adhesives, potting compounds, plating chemicals, etc.);
  - b. the individual HAP content of each HAP-emitting material;
  - c. the total combined HAP content of each HAP-emitting material (i.e. sum of individual HAP contents from b);
  - d. the amount of each HAP-emitting material employed during the previous calendar month;
  - e. the hours of operation, or other emissions determining rationale, of all HAP-generating sources (e.g., fuel combustion, sanding/grinding operations, plating);
  - f. the total individual HAP emissions from all HAP-emitting materials employed and all HAP-generating sources, in pounds or tons per month;
  - g. the total combined HAP emissions from all HAP-emitting materials employed and all HAP-generating sources, in pounds or tons per month;
  - h. the rolling, 12-month summation of individual HAP emissions from all HAP-emitting materials employed and all HAP-generating sources, in tons; and
  - i. the rolling, 12-month summation of total combined HAP emissions from all HAP-emitting materials employed and all HAP-generating sources, in tons.

**The permittee shall have the option of using the potential to emit in place of the recordkeeping described in d)(3) for any "de minimis" or exempt emissions unit for purposes of complying with the facility-wide HAP(s) limitations. Furthermore, the permittee shall have the flexibility to use purchasing records in lieu of recordkeeping requirement as stated in d)(3)d for purposes of complying with the facility-wide HAP(s) limitations.**

- (4) This facility shall maintain the following daily records if any material employed is by definition photo chemically reactive material "PRM" or contains a substance that is by definition "PRM" during any time when non-metal parts are being coated in this emissions unit:
- a. if any material employed is by definition "PRM" or contains a substance that is by definition "PRM", the amount of each "PRM" material or "PRM" containing material employed while coating non-metal parts, in gallons;



- b. if any material employed is by definition "PRM" or contains a substance that is by definition "PRM", the organic compound content of each "PRM" material or "PRM" containing material employed while coating non-metal parts, in lbs/gal;
  - c. if any material employed is by definition "PRM" or contains a substance that is by definition "PRM", the organic compound (OC) emissions of each "PRM" material or "PRM" containing material employed while coating non-metal parts, in lbs of OC/day ("a" x "b");
  - d. if any material employed is by definition "PRM" or contains a substance that is by definition "PRM", the total number of hours this emission unit was used to coat non-metal parts, in hours/day; and
  - e. if any material employed is by definition "PRM" or contains a substance that is by definition "PRM", the estimated hourly OC emission rate while coating non-metal parts, in lbs of OC/hr ("c"/"d").
- (5) The permittee shall collect and record the total number of gallons of coating, including any added thinners and reducers, as applied, when coating metal parts in this emissions unit.
- (6) Modeling to demonstrate compliance with, the AToxic Air Contaminant Statute<sup>6</sup>, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

[ORC 3704.03(F)(3)(c) and F(4)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. rolling 12 month VOC/OC emission rate of 9.9 tons; and
    - ii. 7.5 tons per rolling 12 month period for any single HAP and 22.5 tons per rolling 12 month period for any combinations of HAPs, based upon a rolling, 12-month summation of the monthly emissions
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and



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

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

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

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

f) Testing Requirements

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

a. Emission Limitations:

The VOC/OC emissions from this emissions unit shall not exceed 9.9 tons per rolling 12 month period.

Applicable Compliance Method:

Compliance with the rolling 12 month VOC/OC emissions limitation from this emissions unit shall be determined by the recordkeeping requirement specified in d)(2). Emission Limitations:

b. The total HAP emissions from all emissions units at this facility, including emissions from existing units not listed or specifically addressed in this permit, shall not exceed 7.5 tons per rolling 12 month period for any individual HAP and 22.5 tons per rolling 12 month period for all combined HAPs.

Applicable Compliance Method:

Compliance with the facility-wide HAP emission limitations shall be determined by the recordkeeping requirement specified in d)(3).

(2) USEPA Method 24 or manufacturer=s formulation data shall be used to determine the OC and HAP contents of coatings and clean-up solvents.

(3) Compliance with the emission limitations specified by the SIP and the previous OAC rule 3745-21-07(G)(2) in section A.1 of these terms and conditions shall be determined in accordance with the following methods:



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install and Operate**

**Permit Number:** P0104612

**Facility ID:** 0511010009

**Effective Date:** 4/1/2009

a. Emission Limitations:

The OC emissions from the use photochemically reactive liquid organic materials or substance containing photochemically reactive material shall not exceed 8 pounds per hour nor 40 pounds per day, while coating non-metal parts.

Applicable Compliance Method:

Compliance with the above OC emission limitations shall be determined by the recordkeeping requirement specified in Section d)(5).

g) Miscellaneous Requirements

(1) None.



**2. K012, Silicone Swirl**

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

Silicone Swirl Coating Operation: Metal, Plastic, and circuit board coating.

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. None.
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(1)a., b)(1)b., d)(2), d)(3), e)(1), f)(1)a., and f)(1)b.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) (to avoid Title V requirements for HAP(s) emissions)	The total HAP emissions from all emissions units at this facility, including emissions from existing units not listed or specifically addressed in this permit, shall not exceed 7.5 tons per rolling 12 month period for any single HAP and 22.5 tons per rolling 12 month period for any combinations of HAPs, based upon a rolling, 12-month summation of the monthly emissions.  See Sections d)(3), e)(1), and f)(1)b., below.
b	OAC rule 3745-31-05(F)	9.9 tons OC per rolling 12 month period  See Sections d)(2), e)(1), and f)(1)a., below
c.	OAC rule 3745-31-05(A)(3)(a)(ii)	See Section b)(2)a., below.
d.	OAC rule 3745-21-09(U)(2)	See Sections c)(1), d)(1), and e)(2), below.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-17-11(A)(1)(i)	b)(2)b
f.	40 CFR 63, Subpart HHHHHH	b)(2)c
g.	OAC rule 3745-21-07(G)(2)	When coating non-metal parts, the OC emissions from the use photochemically reactive liquid organic materials or substance containing photochemically reactive material shall not exceed 8 pounds per hour nor 40 pounds per day.  See Sections b)(2)d, d)(4), e)(2), and f)(3), below.
h.	OAC rule 3745-114-01	Ohio Toxic Rule  See Section d)(6), 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), volatile organic compound (VOC), and organic compound (OC) emissions from this emissions unit since the potential emissions for each pollutant are less than ten (10) tons per year.
- b. This emissions unit is not subject to the requirements established by OAC rule 3745-17-11 as long as the permittee maintains coating usage records, coating purchase records and/or coating production records that demonstrate the actual coating usage is less than five gallons per day.
- c. This emissions unit is exempt from the requirements of 40 CFR 63 Subpart HHHHHH, because the operation utilizes only automated coating applicators.
- d. On February 18, 2008, OAC rule 3745-21-07 was revised to delete paragraph (G); therefore, paragraph (G) is no longer part of the State regulations. However, that rule revision has not been approved by the U.S.EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs to OAC rule 3745-21-07, the requirement of the previous OAC rule 3745-21-07(G) still exists as part of the federally approved SIP for Ohio.

Once the February 18, 2008, revised OAC rule 3745-21-07, or modified version of OAC rule 3745-21-07 is approved by the U.S. EPA and Ohio's State Implementation Plan (SIP) is revised, the terms and conditions within this permit which are required by previous OAC rule 3745-21-07(G) will not be required and will not be federally and/or state enforceable.

Once the February 18, 2008, revised OAC rule 3745-21-07, or modified version of OAC rule 3745-21-07 is approved by the U.S. EPA and Ohio's State Implementation Plan (SIP) is revised, the permittee shall take immediate steps to



assure compliance with any and all requirements of the revised OAC rule and/or SIP.

c) Operational Restrictions

- (1) The amount of coating employed in this emissions unit shall not exceed 10 gallons per day, when coating metal parts, including any added thinners and reducers, as applied.

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; and
- b. the number of gallons of each coating employed.

- (2) The permittee shall maintain the following monthly records on the material employed in this emissions unit:

- a. the company identification for each coating and clean-up material employed;
- b. the number of gallons of each coating and clean-up material employed. The clean-up material employed may be based on purchasing records or actual usage tracking;
- c. the VOC/OC content of each coating and clean-up material, in pounds per gallon, as applied;
- d. the total combined VOC/OC generated by all coatings and clean-up materials employed, in tons per month;
- e. the amount of clean-up material recovered, in gallons;
- f. the VOC/OC content of recovered clean-up material, in percent by volume;
- g. the estimated amount of clean-up material recovered, in gallons, (the summation of: ("e" x "f");
- h. the total amount of VOC/OC material recovered, in tons per month, (the summation of: [("g" x 7.51 pounds of gallon\*)/ 2000]);
- i. the total combined monthly VOC/OC emissions, in tons per month, (the summation of: ("d" - "h"); and
- j. the total combined rolling, 12-month summation VOC/OC emissions, in tons. The rolling, 12-month summation of the total VOC/OC emissions (the total amount of VOC/OC emissions for the current month ("i") plus the total amount of VOC/OC emissions for the 11 previous calendar months)

\* This assumed VOC/OC content of 7.51 pounds per gallon is based on the lowest VOC/OC content of the clean-up solvents that will be employed at this facility, which were listed in the PTI application. This assumption represents the worst case emissions



as based on the facility's application. **VOC/OC emission rates calculated based on purchasing records are assumed to represent the worst case actual emissions and may be used to demonstrate compliance with the above list VOC/OC emission limitations, in section b)(1).**

- (3) The permittee shall collect and record the following information each month for all emissions units at this facility, including emissions from units not listed or specifically addressed in this permit:
- a. the company identification for each HAP-emitting material (i.e., all HAP-containing coatings, clean-up materials, resins, adhesives, potting compounds, plating chemicals, etc.);
  - b. the individual HAP content of each HAP-emitting material;
  - c. the total combined HAP content of each HAP-emitting material (i.e. sum of individual HAP contents from b);
  - d. the amount of each HAP-emitting material employed during the previous calendar month;
  - e. the hours of operation, or other emissions determining rationale, of all HAP-generating sources (e.g., fuel combustion, sanding/grinding operations, plating);
  - f. the total individual HAP emissions from all HAP-emitting materials employed and all HAP-generating sources, in pounds or tons per month;
  - g. the total combined HAP emissions from all HAP-emitting materials employed and all HAP-generating sources, in pounds or tons per month;
  - h. the rolling, 12-month summation of individual HAP emissions from all HAP-emitting materials employed and all HAP-generating sources, in tons; and
  - i. the rolling, 12-month summation of total combined HAP emissions from all HAP-emitting materials employed and all HAP-generating sources, in tons.

**The permittee shall have the option of using the potential to emit in place of the recordkeeping described in d)(3) for any "de minimis" or exempt emissions unit for purposes of complying with the facility-wide HAP(s) limitations. Furthermore, the permittee shall have the flexibility to use purchasing records in lieu of recordkeeping requirement as stated in d)(3)d for purposes of complying with the facility-wide HAP(s) limitations.**

- (4) This facility shall maintain the following daily records if any material employed is by definition photo chemically reactive material "PRM" or contains a substance that is by definition "PRM" during any time when non-metal parts are being coated in this emissions unit:
- a. if any material employed is by definition "PRM" or contains a substance that is by definition "PRM", the amount of each "PRM" material or "PRM" containing material employed while coating non-metal parts, in gallons;



- b. if any material employed is by definition "PRM" or contains a substance that is by definition "PRM", the organic compound content of each "PRM" material or "PRM" containing material employed while coating non-metal parts, in lbs/gal;
  - c. if any material employed is by definition "PRM" or contains a substance that is by definition "PRM", the organic compound (OC) emissions of each "PRM" material or "PRM" containing material employed while coating non-metal parts, in lbs of OC/day ("a" x "b");
  - d. if any material employed is by definition "PRM" or contains a substance that is by definition "PRM", the total number of hours this emission unit was used to coat non-metal parts, in hours/day; and
  - e. if any material employed is by definition "PRM" or contains a substance that is by definition "PRM", the estimated hourly OC emission rate while coating non-metal parts, in lbs of OC/hr ("c"/"d").
- (5) The permittee shall collect and record the total number of gallons of coating, including any added thinners and reducers, as applied, when coating metal parts in this emissions unit.
- (6) Modeling to demonstrate compliance with, the AToxic Air Contaminant Statute<sup>2</sup>, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

[ORC 3704.03(F)(3)(c) and F(4)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. rolling 12 month VOC/OC emission rate of 9.9 tons; and
    - ii. 7.5 tons per rolling 12 month period for any single HAP and 22.5 tons per rolling 12 month period for any combinations of HAPs, based upon a rolling, 12-month summation of the monthly emissions
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and



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

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

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

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

f) Testing Requirements

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

a. Emission Limitations:

The VOC/OC emissions from this emissions unit shall not exceed 9.9 tons per rolling 12 month period.

Applicable Compliance Method:

Compliance with the rolling 12 month VOC/OC emissions limitation from this emissions unit shall be determined by the recordkeeping requirement specified in d)(2). Emission Limitations:

b. The total HAP emissions from all emissions units at this facility, including emissions from existing units not listed or specifically addressed in this permit, shall not exceed 7.5 tons per rolling 12 month period for any individual HAP and 22.5 tons per rolling 12 month period for all combined HAPs.

Applicable Compliance Method:

Compliance with the facility-wide HAP emission limitations shall be determined by the recordkeeping requirement specified in d)(3).

(2) USEPA Method 24 or manufacturer=s formulation data shall be used to determine the OC and HAP contents of coatings and clean-up solvents.

(3) Compliance with the emission limitations specified by the SIP and the previous OAC rule 3745-21-07(G)(2) in section A.1 of these terms and conditions shall be determined in accordance with the following methods:



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install and Operate**

**Permit Number:** P0104612

**Facility ID:** 0511010009

**Effective Date:** 4/1/2009

a. Emission Limitations:

The OC emissions from the use photochemically reactive liquid organic materials or substance containing photochemically reactive material shall not exceed 8 pounds per hour nor 40 pounds per day, while coating non-metal parts.

Applicable Compliance Method:

Compliance with the above OC emission limitations shall be determined by the recordkeeping requirement specified in Section d)(5).

g) Miscellaneous Requirements

(1) None.