State of Ohio Environmental Protection Agency

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Columbus, OH 43216-1049

4/14/2009

Certified Mail

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

Ms. Rae Presz
SAINT GOBAIN PERFORMANCE PLASTICS
335 N. Diamond Street
Ravenna, OH 44266

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1667060007
Permit Number: P0104587
Permit Type: Initial Installation
County: Portage

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Record Courier. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control Web page http://www.epa.state.oh.us/dapc in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

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

and

Akron Regional Air Quality Management District
146 South High Street, Room 904
Akron, OH 44308

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install and operate will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install and Operate is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Akron Regional Air Quality Management District at (330)375-2480.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
ARAQMD; Pennsylvania; West Virginia; Canada

Portage County

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
SAINT GOBAIN PERFORMANCE PLASTICS

Issue Date: 4/14/2009
Permit Number: P0104587
Permit Type: Initial Installation
Permit Description: Installation of two spray paint booths for plastic parts.
Facility ID: 1667060007
Facility Location: SAINT GOBAIN PERFORMANCE PLASTICS
335 N DIAMOND ST,
RAVENNA, OH 44266
Facility Description: All Other Plastics Product Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Frank Markunas at Akron Regional Air Quality Management District, 146 South High Street, Room 904 or (330)375-2480. The permit can be downloaded from the Web page: www.epa.state.oh.us/dapc

Permit Strategy Write-Up

1. Check all that apply:

   _X_ Synthetic Minor Determination

   ___ Netting Determination

2. Source Description:

   Saint-Gobain Performance Plastics Corporation manufactures and repairs radomes for the aerospace industry. Saint-Gobain Performance Plastics Corporation currently consists of six spray paint booths (R001 through R006), Lanly curing oven (P001), and saws and sander (P002). Saint-Gobain Performance Plastics Corporation is applying for permits for the installation of two new spray paint booths (R007 and R008).

3. Facility Emissions and Attainment Status:

   Currently, Saint-Gobain Performance Plastics Corporation's actual emissions are below twenty percent of any major regulated pollutant threshold. The facility is located in Portage County which is non attainment for ozone.

4. Source Emissions:

   The two new spray paint spray booths (R007 and R008) have a potential to emit of 40.8 tons per year for an individual hazardous air pollutant (HAP) and 46.7 tons per year for combined HAPs. To avoid Title V and MACT applicability (40 CFR Part 63, subpart GG), Saint-Gobain Performance Plastics Corporation has requested a synthetic minor. The facility's emissions of volatile organic compounds (VOC), any individual HAP, and combined HAPs will be restricted to 49.0 tons per year, 5.0 tons per year, and 12.0 tons per year, respectively, for emissions unit R001 through R008, combined.

5. Conclusion:

   Through record keeping of the coating, coating additive, and cleanup material usage, the VOC content, the individual HAP content, and the combined HAPs content of each material, Saint-Gobain Performance Plastics Corporation will demonstrate compliance the above-mentioned emissions limits. By accepting the above-mentioned emission limitation, Saint-Gobain Performance Plastics Corporation will avoid Title V and MACT applicability (40 CFR Part 63, subpart GG).

6. Please provide additional notes or comments as necessary:

   None

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

Pollutant	Tons Per Year
VOC	49.0*
Any individual HAP	5.0*
Combined HAPs	12.0*

*as a rolling 12-month summation for emissions units R001, R002, R003, R004, R005, R006, R007, and R08,combined.

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

DRAFT

Air Pollution Permit-to-Install and Operate
for
SAINT GOBAIN PERFORMANCE PLASTICS

Facility ID:	1667060007
Permit Number:	P0104587
Permit Type:	Initial Installation
Issued:	4/14/2009
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install and Operate
for
SAINT GOBAIN PERFORMANCE PLASTICS

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Authorization

Facility ID: 1667060007
Application Number(s): A0037123, A0037367
Permit Number: P0104587
Permit Description: Installation of two spray paint booths for plastic parts.
Permit Type: Initial Installation
Permit Fee: $400.00 *DO NOT send payment at this time - subject to change before final issuance*
Issue Date: 4/14/2009
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

SAINT GOBAIN PERFORMANCE PLASTICS
335 N DIAMOND ST
RAVENNA, OH 44266

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:

Akron Regional Air Quality Management District
146 South High Street, Room 904
Akron, OH 44308
(330)375-2480

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Authorization (continued)

Permit Number: P0104587
Permit Description: Installation of two spray paint booths for plastic parts.

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

Group Name: Spray Booths

Emissions Unit ID:	**R007**
Company Equipment ID:	Spray Booth #5
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R008**
Company Equipment ID:	Spray Booth #6
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.
You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

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

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) 1.c), 1.d), 1.e), 1.f), and 1.g).

   c) The emissions of any individual hazardous air pollutant (HAP), combined HAPs, and volatile organic compounds (VOC) from emissions units R001, R002, R003, R004, R005, R006, R007, and R008, combined, shall not exceed 5.0 tons per year, 12.0 tons per year, and 49.0 tons per year, respectively, based upon the rolling, 12-month summations of the monthly emission rates. To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissions of any individual HAP	Maximum Allowable Cumulative Emissions of combined HAPs	Maximum Allowable Cumulative Emissions of VOC
1	0.4 ton	1.0 ton	4.1 tons
1-2	0.8 ton	2.0 tons	8.2 tons
1-3	1.3 tons	3.0 tons	12.3 tons
1-4	1.7 tons	4.0 tons	16.3 tons
1-5	2.1 tons	5.0 tons	20.4 tons
1-6	2.5 tons	6.0 tons	24.5 tons
1-7	2.9 tons	7.0 tons	28.6 tons
1-8	3.3 tons	8.0 tons	32.7 tons
1-9	3.8 tons	9.0 tons	36.8 tons
1-10	4.2 tons	10.0 tons	40.8 tons
1-11	4.6 tons	11.0 tons	44.9 tons
1-12	5.0 tons	12.0 tons	49.0 tons

   After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitations for any individual HAP,

combined HAPs, and VOC shall be based upon the rolling, 12-month summations of the monthly emissions.

d) In order to demonstrate compliance with the emission limitations in 1.c) above, the permittee shall collect and record the following information each month for emissions units R001, R002, R003, R004, R005, R006, R007, and R008, combined:

(1) the name and identification number of each coating and coating additive (i.e., activator, accelerator, catalyst, curing agent, thinner, etc.) employed;

(2) the VOC content of each coating and coating additive, in pounds per gallon or weight fraction;

(3) the individual HAP content for each HAP of each coating and coating additive, in pounds per gallon or weight fraction;

(4) the combined HAPs content of each coating and coating additive, in pounds per gallon or weight fraction;

(5) the number of gallons or pounds of each coating and coating additive employed;

(6) the name and identification of each cleanup material employed;

(7) the VOC content of each cleanup material, in pounds per gallon or weight fraction;

(8) the individual HAP content for each HAP of each cleanup material, in pounds per gallon or weight fraction;

(9) the combined HAPs content of each cleanup material, in pounds per gallon or weight fraction;

(10) the number of gallons or pounds of each cleanup material employed;

(11) the total VOC, each individual HAP, and combined HAPs emissions, in tons, from all the coatings, coating additives, and cleanup materials employed;

(12) beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month VOC, each individual HAP, and combined HAPs emissions, in tons, from all the coatings, coating additives, and cleanup materials employed; and

(13) Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative VOC, each individual HAP, and combined HAPs emissions for each calendar month

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

(1) 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:

a. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the rolling, 12-month emission limitation for VOC, for emissions units R001, R002, R003, R004, R005, R006, R007, and R008, combined;

b. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedance of the rolling, 12-month emission limitation for any individual HAP, for emissions units R001, R002, R003, R004, R005, R006, R007, and R008, combined;

c. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the rolling, 12-month emission limitation for combined HAPs, for emissions units R001, R002, R003, R004, R005, R006, R007, and R008,combined; and

d. for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels for any individual HAP, combined HAPs, and VOC, for emissions units R001, R002, R003, R004, R005, R006, R007, and R008, combined.

(2) the probable cause of each deviation (excursion);

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

(4) 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, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

f) 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.

g) Compliance with the emissions limitation(s) in 1.c) above shall be determined in accordance with the following method(s):

(1) Emission Limitation:

The emissions of any HAP, combined HAPs, and VOC from emissions units R001, R002, R003, R004, R005, R006, R007, and R008, combined, shall not exceed 5.0 tons per year, 12.0 tons per year, and 49.0 tons per year, respectively, based upon the rolling, 12-month summations of the monthly emission rates.

Applicable Compliance Method:

Compliance with the annual allowable VOC, individual HAP, and combined HAPs emission limitations above shall be demonstrated based on the record keeping requirements established in 1.d) above.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group - Spray Booths: R007, R008,

EU ID	Operations, Property and/or Equipment Description
R007	Coating Operating for Plastic Parts - Spray Paint Booth #5
R008	Coating Operating for Plastic Parts - Spray Paint Booth #6

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

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

a. b)(1)i., d)(7), d)(8), d)(9), d)(10), and e)(2).

(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)d.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The emissions of volatile organic compounds (VOC) from this emissions unit shall not exceed 6.0 pounds per hour. See b)(2)(f) below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	See b)(2)a. below.
c.	OAC rule 3745-31-05(A)(3)(a)(ii)	See b)(2)b. below.
d.	OAC rule 3745-31-05(D) (Synthetic Minor to Avoid Title V and MACT applicability under 40 CFR Part 63, Subpart GG)	See 1.c) of Section B – Facility-Wide Terms and Conditions.
e.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed twenty per cent opacity, as a six-minute average.
f.	OAC rule 3745-17-10(B)	The maximum allowable amount of PE shall be 0.020 pound per million Btu of actual heat input.
g.	OAC rule 3745-17-11(C)	See b)(2)c. and b)(2)d. below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
h.	OAC rule 3745-21-07(G)	When employing, applying, evaporating, or drying any photochemically reactive material, or substance containing such photochemically reactive material, the permittee shall not discharge more than 40 pounds of organic material into the atmosphere in any one day, nor more than 8 pounds of organic material in any one hour. See b)(2)e. below.
i.	OAC rule 3745-114-01	See d)(7) below.

(2) Additional Terms and Conditions

a. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the nitrogen oxides (NO_x), carbon monoxide (CO), and sulfur dioxide (SO_2) from this air contaminant source since the uncontrolled potentials to emit for NO_x, CO, and SO_2 are less than ten tons per year.

b. Federally enforceable permit-to-install and operate (FEPTIO) P0104587 for this air contaminant source takes into account the use of a passive dry filter, whenever this air contaminant source is in operation, with a minimum control efficiency of 90%, by weight for PE, as a voluntary restriction as proposed by the permittee for the purpose of avoiding BAT requirements under OAC rule 3745-31-05(A)(3).

c. 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.

d. The permittee shall install and operate a dry particulate filter system whenever this emissions unit is in operation.

e. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio=s State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The requirements of amended OAC rule 3745-21-07 do not apply to emissions units that are installed after February 18, 2008. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(1)h., d)(6), e)(1) and f)(1)c.

f. The hourly VOC emission limitation is based on the emissions unit's potential to emit. Therefore, no monitoring, record keeping or reporting is required to demonstrate compliance with this emission limitation.

c) Operational Restrictions

(1) 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.

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

d) Monitoring and/or Recordkeeping Requirements

(1) 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.

(2) 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.

(3) 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.

(4) 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.

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

(6) The permittee shall collect and record the following information for each day for the coating operation:

a. the company identification for each coating and photochemically reactive cleanup material employed;

b. the number of gallons of each coating and photochemically reactive cleanup material employed;

c. the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;

d. the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;

e. the total number of hours the emissions unit was in operation; and

f. the average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of Aphotochemically reactive@ and Anonphotochemically reactive@ are based upon OAC rule 3745-21-01(C)(5).]

(7) The FEPTIO application for these emissions units, R007 and R008, was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee. The AToxic Air Contaminant Statute@, ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled AReview of New Sources of Air Toxic Emissions, Option A@, as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw

materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists= (ACGIH) AThreshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices@; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists= (ACGIH) AThreshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices@; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., AX@ hours per day and AY@ days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

TLV/10 x 8/X x 5/Y = 4 TLV/XY = MAGLC

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or Aworst case@ toxic contaminant(s):

Toxic Contaminant: Toluene

TLV (mg/m3): 75

Maximum Hourly Emission Rate (lbs/hr): 4.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 273

MAGLC (ug/m3): 1794

Toxic Contaminant: Xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 9.32

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 607

MAGLC (ug/m3): 10,333

Toxic Contaminant: Methyl Isobutyl Ketone

TLV (mg/m3): 205

Maximum Hourly Emission Rate (lbs/hr): 3.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 195

MAGLC (ug/m3): 4875

Toxic Contaminant: Ethylene Glycol Mono-ethyl Ether Acetate

TLV (mg/m3): 27

Maximum Hourly Emission Rate (lbs/hr): 0.32

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 21

MAGLC (ug/m3): 643

The permittee, has demonstrated that emissions of toluene, xylene, methyl ethyl ketone, and ethylene glycol mono-ethyl ether acetate, from emissions units R007 and R008, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the AToxic Air Contaminant Statute@, ORC 3704.03(F).

(8) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration@, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the AToxic Air Contaminant Statute@ will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the AToxic Air Contaminant Statute@, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a “modification”, the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level

concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

(9) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the AToxic Air Contaminant Statute@, ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the AToxic Air Contaminant Statute@, ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the AToxic Air Contaminant Statute@, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the AToxic Air Contaminant Statute@, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

(10) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the AToxic Air Contaminant Statute@, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

(1) The permittee shall identify in the annual permit evaluation report the following information concerning the hourly and daily organic compound emissions during the 12-month reporting period for this/these emissions unit(s):

a. an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and

b. an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

(2) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum

ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

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

f) Testing Requirements

(1) Compliance with the emission limitation(s) in b)(1) above shall be determined in accordance with the following method(s):

a. Emission Limitation:

The emissions of VOC from this emissions unit shall not exceed 6.0 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation above shall be demonstrated by multiplying the VOC content of the worst-case coating, as applied, in pounds of VOC per gallon coating by the maximum hourly coating usage (1 gallon per hour) plus multiplying 0.0054 pound of VOC per MM Btu of heat input* by the maximum hourly heat input for the drying oven (1.5 MM Btu/hour).

If required, the permittee shall demonstrate compliance with the hourly limitation in accordance with Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

*AP-42 emission factor from Table 1.4-2 dated 7/98 convert from lb/10^6 standard cubic feet (scf) to lb/MM Btu, divide by 1,020.

b. Emission Limitation:

Visible particulate emissions from any stack shall not exceed twenty per cent opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance with the visible particulate emission limitation for any stack from the emissions unit shall be demonstrated in accordance with the test method and procedures specified in OAC rule 3745-17-07(B)(1).

c. Emission Limitations:

When employing, applying, evaporating, or drying any photochemically reactive material, or substance containing such photochemically reactive material, the permittee shall not discharge more than 40 pounds of organic material into the

atmosphere in any one day, nor more than 8 pounds of organic material in any one hour.

Applicable Compliance Method:

Compliance with the hourly and daily allowable organic material emission limitations shall be demonstrated through the record keeping requirements established in d)(6) above.

d. Emission Limitation:

The maximum allowable amount of PE shall be 0.020 pound per million Btu of actual heat input.

Applicable Compliance Method:

Compliance with the allowable PE emission limitation above shall be demonstrated dividing the AP-42 emission factor 7.6 pounds of PE per million standard cubic feet of natural gas fire* by 1020 pounds per MM Btu.

If required, the permittee shall demonstrate compliance with the limitation above in accordance with OAC rule 3745-17-03((B)(9).

*AP-42 emission factor from Table 1.4-2 dated 7/98.

g) Miscellaneous Requirements

(1) None.