



State of Ohio Environmental Protection Agency

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

5/28/2009

Certified Mail

Ms. Emily Langenderfer  
Comfort Line Ltd.  
5500 Enterprise Blvd  
Toledo, OH 43612

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 0448011664  
Permit Number: P0104626  
Permit Type: OAC Chapter 3745-31 Modification  
County: Lucas

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR
No	CEMS
Yes	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 (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully.

The issuance of this PTI 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

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Toledo Department of Environmental Services. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page <http://www.epa.state.oh.us/dapc>.

Sincerely,

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*  
Toledo Department of Environmental Services

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  
for  
Comfort Line Ltd.**

Facility ID: 0448011664  
Permit Number: P0104626  
Permit Type: OAC Chapter 3745-31 Modification  
Issued: 5/28/2009  
Effective: 5/28/2009





**Air Pollution Permit-to-Install**  
for  
Comfort Line Ltd.

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State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install**  
**Permit Number:** P0104626  
**Facility ID:** 0448011664  
**Effective Date:** 5/28/2009

## Authorization

Facility ID: 0448011664  
Facility Description: Manufacture of extruded plastics  
Application Number(s): A0037173, A0037286  
Permit Number: P0104626  
Permit Description: Increase throughput on mail coating line (K001) and add drying oven (P014) to coating lines (K001 & K002)  
Permit Type: OAC Chapter 3745-31 Modification  
Permit Fee: \$400.00  
Issue Date: 5/28/2009  
Effective Date: 5/28/2009

This document constitutes issuance to:

Comfort Line Ltd.  
5500 Enterprise Blvd  
Toledo, OH 43612

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

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

Toledo Department of Environmental Services  
348 South Erie Street  
Toledo, OH 43604  
(419)936-3015

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski  
Director



State of Ohio Environmental Protection Agency  
 Division of Air Pollution Control

**Final Permit-to-Install**  
**Permit Number:** P0104626  
**Facility ID:** 0448011664  
**Effective Date:** 5/28/2009

## Authorization (continued)

Permit Number: P0104626  
 Permit Description: Increase throughput on mail coating line (K001) and add drying oven (P014) to coating lines (K001 & K002)

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>K001</b>
Company Equipment ID:	Main Paint Line
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K002</b>
Company Equipment ID:	Custom Paint Line
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P014</b>
Company Equipment ID:	P014
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install**  
**Permit Number:** P0104626  
**Facility ID:** 0448011664  
**Effective Date:** 5/28/2009

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



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

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
  - (1) Standard Term and Condition A. 2.a), Severability Clause
  - (2) Standard Term and Condition A. 3.c) through A. 3.e) General Requirements
  - (3) Standard Term and Condition A. 6.c) and A. 6.d), Compliance Requirements
  - (4) Standard Term and Condition A. 9., Reporting Requirements
  - (5) Standard Term and Condition A. 10., Applicability
  - (6) Standard Term and Condition A. 11.b) through A. 11.e), Construction of New Source(s) and Authorization to Install
  - (7) Standard Term and Condition A. 14., Public Disclosure
  - (8) Standard Term and Condition A. 15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (9) Standard Term and Condition A. 16., Fees
  - (10) Standard Term and Condition A. 17., Permit Transfers

## **2. Severability Clause**

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

## **3. General Requirements**

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.



- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Toledo Department of Environmental Services.



(2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Toledo Department of Environmental Services. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

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

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

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

## 5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Toledo Department of Environmental Services in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

## 6. Compliance Requirements

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

b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:



- (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Toledo Department of Environmental Services concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

## **7. Best Available Technology**

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

## **8. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

## **9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Toledo Department of Environmental Services.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Toledo Department of Environmental Services. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted



(i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

## **10. Applicability**

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

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

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



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

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

**12. Permit-To-Operate Application**

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

**13. Construction Compliance Certification**

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

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

**14. Public Disclosure**

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

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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

**16. Fees**

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



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install**  
**Permit Number:** P0104626  
**Facility ID:** 0448011664  
**Effective Date:** 5/28/2009

**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Toledo Department of Environmental Services must be notified in writing of any transfer of this permit.

**18. Risk Management Plans**

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

**19. Title IV Provisions**

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



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install**  
**Permit Number:** P0104626  
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**Effective Date:** 5/28/2009

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



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - a) None.
  
2. The combined emissions of Volatile Organic Compounds (VOC) from all emission units at this facility shall not exceed 90.00 tons per year, based upon a rolling, 12-month summation of the monthly emissions.  
  
The combined emissions of VOC shall include the following emission units: K001, K002, P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013 and P014.
  
3. The permittee shall maintain monthly records of the following information:  
  
The rolling, 12-month summation of the VOC emissions, calculated by adding the current month's VOC emissions from all emission units at this facility to the VOC emissions for the preceding eleven calendar months from all emission units at this facility.
  
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC. These reports shall be submitted in accordance with the reporting requirements specified in the Standard Terms and Conditions, of this permit.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install**  
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## **C. Emissions Unit Terms and Conditions**



**1. K001, Main Paint Line**

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

Main Coating Line for fiberglass reinforced pultruded styrene resin modified to increase throughput and account for a drying oven (P014).

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions from coatings employed shall not exceed 15.0 pounds per hour and 65.7 tons per year.</p> <p>VOC emissions from line cleanup shall not exceed 104.9 pounds per month and 0.63 ton per year.</p> <p>The requirements of this rule also include compliance with OAC rules 3745-31-05(D), 3745-17-07(A)(1), 3745-17-11(B)(1) and 40 CFR Part 63 Subpart PPPP.</p>
b.	OAC rule 3745-31-05(D)	See B.2.
c.	40 CFR Part 63 Subpart PPPP	<p>Organic HAP emissions from all coating operations onsite shall not exceed 0.16 pounds of organic HAP emissions per pound of coating solids applied during each 12-month compliance period.</p> <p>See c)(3) and b)(2)b.</p>
d.	40 CFR Part 63 Subpart A	See b)(2)c.
e.	OAC rule 3745-17-07(A)(1)	Visible emissions (VE) from this emissions unit shall not exceed 20% opacity as a 6-minute average.
f.	OAC rule 3745-17-11(B)(1)	Particulate emissions (PE) shall not exceed 0.551 pound per hour.
g.	OAC rule 3745-21-07(G)(9)(f)	Exemption from OAC 3745-21-07(G)(2) emissions limitation due to usage of non-



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		photochemically reactive materials. See c)2. and b)(2)d.
h.	OAC rule 3745-31-05(A)(3)(a)(ii)	See b)(2)a.
i.	OAC rule 3745-114-01	See b)(2)e.

(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 from this air contaminant source since the calculated annual emission rate for particulate emissions is less than ten tons per year taking into account the federally enforceable rule limit of 0.551 pound per hour particulate emissions established under OAC rule 3745-17-11(B)(1).
- b. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products, as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart PPPP.

The final rules found in 40 CFR Part 63, Subpart PPPP establish national emission standards for hazardous air pollutants (HAP), work practice standards, operating limitations, and compliance requirements for plastic parts coating operations. The affected source is the collection of all of the following operations for or from the surface coating of plastic parts and products:

- i. all coating operations as defined in 40 CFR 63.4581;
- ii. all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
- iii. all manual and automated equipment and containers used for conveying coatings, thinners, other additives, purge, and cleaning materials; and
- iv. all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by the coating operations.

The permittee, using the "compliant material" option, shall not apply any coating in the coating operation(s) with an organic HAP content greater than or equal to the limitation(s) contained in 40 CFR 63.4490; and all the thinners, additives, and cleaning/purge materials applied shall not contain organic HAP. If any individual coating applied does not meet the limitation of the rule, or any thinner, additive, and/or cleaning/purge material contains organic HAP, the mass average organic HAP emission rate shall be calculated as required in 40 CFR 63.4551 and 63.4552 for the compliance period.

If the permittee chooses to use the "compliant coating option" for any coating or a group of coatings, in order to demonstrate compliance with this NESHAP, such coating operation(s) shall not apply any coating with an organic HAP content



greater than or equal to the limitation(s) contained in 40 CFR 63.4490; and all the thinners, additives, and cleaning/purge materials applied shall not contain organic HAP. If any individual material, used within a group of materials applied in the "compliant coating operation", exceeds the emission limitation for that coating group; or a thinner, additive, or cleaning/purge material containing an organic HAP is applied, the mass average organic HAP content for the coating operations must be calculated as required in this permit.

For any coating operation(s) that is meeting the emission limitations in 40 CFR 63.4490 by using the "without add-on control" option, the permittee shall maintain the emissions unit(s) in compliance with the applicable emission limitation at all times, as determined at the end of each month and on a rolling, 12-month basis following the initial compliance period, i.e., the mass average organic HAP emission rate shall be calculated each month as required in 40 CFR 63.4551 and 63.4552.

- c. Table 2 to 40 CFR Part 63, Subpart PPPP shows which sections of the General Provisions in 40 CFR Part 63, Subpart A apply to this emission unit.
- d. Any emission limits or operational restrictions within this permit pertaining to photochemically reactive materials shall cease to be effective and federally enforceable on the date the U.S. EPA approves the revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, the emission limitations, monitoring, record keeping, reporting and testing requirements related to the restriction of the use of photochemically reactive materials included in c)(2), d)(1)a., d)(1)(i)ii., and e)(1)a. shall be void.
- e. Per engineering guide #70, emission units subject to a MACT standard are exempt from air toxic modeling. This emission unit is subject to 40 CFR Part 63 Subpart PPPP.

c) Operational Restrictions

- (1) The permittee shall operate the paint booth fabric filter system whenever this emissions unit is in operation.
- (2) Coatings, reduction solvents and/or cleanup solvents that are Photochemically Reactive Materials as defined in OAC rule 3745-21-01(C)(5) shall not be used in this emission unit.
- (3) Cleanup solvent and reduction solvent shall not contain HAP.
- (4) Every individual coating used in the "compliant coating operations" must meet the emission limitation(s) contained in 40 CFR 63.4490; and all the thinners, additives, and cleaning/purge materials applied shall not contain organic HAP. Any coating operation meeting these limitations, for each material applied, shall not be required to meet the operating limits in 40 CFR 63.4492 or work practice standards in 40 CFR 63.4493.
- (5) The permittee shall operate and maintain, at all times, any emissions unit contained in this permit (including the associated air pollution control equipment and monitoring equipment) in a manner consistent with safety and good air pollution control practices for



minimizing emissions. During a period of startup, shutdown, or malfunction, this general duty to minimize emissions requires that the operator/permittee reduce emissions to the greatest extent which is consistent with safety and good air pollution control practices. Malfunctions must be corrected as soon as practicable after their occurrence.

The requirement to minimize emissions during any period of startup, shutdown, or malfunction does not require the permittee to achieve emission levels that would be required by the applicable standard at other times, if it is not consistent with safety and good air pollution control practices; nor does it require the operator/permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. The operational and maintenance requirements contained in the NESHAP are enforceable, independent of the emissions limitations or other requirements of the rule.

Determination of whether such operation and maintenance procedures are being applied shall be based on information requested by and made available to the director (appropriate Ohio EPA Division of Air Pollution Control District Office or local air agency), which may include, but shall not be limited to: monitoring results, operation and maintenance procedures (including the startup, shutdown, and malfunction plan or other standard operating procedures), operation and maintenance records, and inspection of the facility.

- (6) If the permittee can meet the emission limitation(s) contained in 40 CFR 63.4490 without add-on controls, by calculating the rolling, 12-month HAP emission rate at the end of each month, the permittee shall not be required to meet the operating limits contained in 40 CFR 63.4492 or work practice standards contained in 40 CFR 63.4493.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall collect and record the following information for the coating operation:
  - a. the company identification for each coating and reduction solvent, including verification that the coating as applied is not a photochemically reactive material and the reduction solvent contains no HAP;
  - b. the number of gallons of each coating employed for each day, as applied, while the associated oven (P014) was in operation;
  - c. the number of gallons of each coating employed for each day, as applied, while the associated oven (P014) was NOT in operation;
  - d. the volatile organic compound content of each coating employed, in pounds per gallon as applied;
  - e. The total volatile organic compound emission rate for all coatings while the associated oven (P014) was in operation, in pounds per day (b. x d.);
  - f. The total volatile organic compound emission rate for all coatings while the associated oven (P014) was NOT in operation, in pounds per day (c. x d.);
  - g. The total number of hours the emissions unit was in operation each day;



- h. The individual HAP and total HAP content of each coating in pounds per gallon as applied; and
- i. for each month, the following information on cleanup solvent:
  - i. the company identification for each cleanup material used;
  - ii. an identification of whether or not each cleanup material employed is photochemically reactive or contains HAP;
  - iii. the gallons of cleanup material used per month;
  - iv. the pounds of VOC per gallon of cleanup material;
  - v. the gallons of spent cleanup material recovered for disposal;
  - vi. the pounds of VOC per gallon of spent cleanup material; and
  - vii. the pounds per month of VOC emissions from cleanup.
- j. For each year, the tons of VOC emitted from coating and cleanup.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, the d)(1)a and d)(1)i.ii. references to photochemically reactive material will be voided entirely.]

- (2) The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
- (3) The permittee shall collect and record the following information each month for this emissions unit when utilizing the compliant coatings option:
  - a. the name and identification number of each coating, thinner (includes any other additives and/or solvent blends), and cleanup/purge material, applied in the plastic parts coating operation(s), including at a minimum:
    - i. information from the supplier or manufacturer,
    - ii. formulation data and/or coating/material testing data,
    - iii. all data, documentation, and/or calculations needed to demonstrate that each coating meets the limits contained in 40 CFR 63.4490 and that each thinner, additive, and cleanup material applied in the plastic parts coating operations contained no organic HAP\*;
  - b. the number of gallons or liters of each coating, thinner/additive, and cleanup/purge material employed;
  - c. the density of each coating, thinner/additive, and cleanup/purge material employed, in kg/liter or pounds/gallon, determined using ASTM Method D1475-98 or from information provided by the supplier or manufacturer of the material;



- d. the mass fraction of organic Hazardous Air Pollutants (HAP) for each coating, thinner/additive, and cleanup/purge material applied during the month, as a weight fraction, i.e., pound of HAP/pound of coating or kg HAP/kg coating, using one of the following methods:
  - i. Method 311 from 40 CFR Part 63, Appendix A;
  - ii. Method 24 from 40 CFR Part 60, Appendix A if all nonaqueous volatile matter is to be used for the mass fraction of HAP; or
  - iii. information from the supplier or manufacturer of the materials, where the mass fraction of organic HAP can be calculated from the density and the mass of HAP per gallon of each material (pound HAP/gallon of material pounds/gallon of material, or calculated in kg/liter);
- e. the mass fraction of coating solids (pound of coating solids/pound of coating or kg of coating solids /kg coating) for each coating applied, determined using one of the following methods:
  - i. Method 24 from 40 CFR Part 60, Appendix A; or
  - ii. information from the supplier or manufacturer of the coatings, where the mass fraction of coating solids can be calculated from the density and the mass of solids per gallon of each material (pound solids/gallon of coating pounds/gallon of coating, or calculated in kg/kg);
- f. the organic HAP content of each coating, in pound of organic HAP emitted per pound of coating solids used or kg of organic HAP emitted per kg of coating solids used, calculated as follows for each coating applied in the plastic parts coating operations using the "compliant material" option:

$$H_c = W_c / S_c$$

where:

$H_c$  is the organic HAP content of coating "c", in kg organic HAP emitted per kg of coating solids used or pound of organic HAP emitted per pound of coating solids used.

$W_c$  is the mass fraction of organic HAP in coating "c", kg HAP per kg coating or pound of HAP per pound of coating, as determined in (d) above.

$S_c$  is the mass fraction of coating solids in coating "c", kg coating solids per kg coating or pound of coating solids per pound of coating, as determined in (e) above; and

- g. all calculations required by this permit for each rolling 12-month compliance period.

In order to demonstrate continuous compliance, the calculated organic HAP content ( $H_c$ ) for each coating used must be less than or equal to the applicable emission limit in 40 CFR 63.4490; and each thinner and/or other additive, and cleaning material used during the each compliance period (each month) must



contain no organic HAP. These records shall constitute a separate initial compliance demonstration for each coating applied.

Each record shall be maintained for 5 years following the date of the occurrence, measurement, maintenance, corrective action, report, or record. These records must be kept on-site for the first two years of this 5-year period of time.

\*No organic HAP means no HAP at 1.0% or more by mass and no HAP defined by the Occupational Safety and Health Administration (OSHA) as a carcinogen, in 29 CFR 1910.1200(d)(4), equal to or greater than 0.1% by mass.

- (4) The permittee shall collect and record the following information each month for this emissions unit when utilizing the "without add-on controls" option:
- a. the name and identification number of each coating, thinner (includes any other additives and/or solvent blends), and cleanup/purge material, applied in the plastic parts coating operation(s), including information from the supplier or manufacturer, formulation data, and/or coating/material testing data;
  - b. the number of gallons or liters of each coating, thinner/additive, and cleanup/purge material employed;
  - c. the density of each coating, thinner/additive, and cleanup/purge material employed, in kg/liter or pounds/gallon, determined using ASTM Method D1475-98 or from information provided by the supplier or manufacturer of the material;
  - d. the mass fraction of organic Hazardous Air Pollutants (HAP) for each coating, thinner/additive, and cleanup/purge material applied during the month, as a weight fraction, i.e., pound of HAP/pound of coating or kg HAP/kg coating, using one of the following methods:
    - i. Method 311 from 40 CFR Part 63, Appendix A;
    - ii. Method 24 from 40 CFR Part 60, Appendix A if all nonaqueous volatile matter is to be used for the mass fraction of HAP;
    - iii. information from the supplier or manufacturer of the materials, where the mass fraction of organic HAP can be calculated from the density and the mass of HAP per gallon of each material (pounds HAP/gallon of material pounds/gallon of material, or calculated in kg/liter); or
    - iv. solvent blends listed as single components and where neither test data nor manufacturer's data is available, default values from Table 3 to Subpart PPPP or Table 4 if not listed in Table 3, can be used.
  - e. the mass fraction of coating solids (pound of coating solids/pound of coating or kg of coating solids /kg coating) for each coating applied determined using one of the following methods:
    - i. Method 24 from 40 CFR Part 60, Appendix A; or
    - ii. information from the supplier or manufacturer of the coatings, where the mass fraction of coating solids can be calculated from the density and the



mass of solids per gallon of each material (pound solids/gallon of coating pounds/gallon of coating, or calculated in kg/kg);

- f. the total mass of organic HAP (pound or kg) in all of the coatings, thinners/additives, and cleanup/purge materials (as purchased) applied during the month, calculated separately for coatings, thinners/additives, and cleanup/purge materials as follows:

$$\text{HAP} = \sum ((\text{VOL}_i) (D_i) (W_i))$$

where:

sum is from  $i=1$  to  $i=r$

HAP is the total mass of organic HAP in the coatings, thinners/additives, and cleanup/purge materials used each month, in pound or kg of HAP for each: 1. the coatings (HAP<sub>c</sub>), 2. thinners/additives (HAP<sub>t</sub>), and 3. cleanup/purge materials (HAP<sub>cu</sub>).

VOL<sub>i</sub> is the volume of material "i" documented in b. above, in gallons or liters.

D<sub>i</sub> is the density of material "i" as documented in c. above, in pounds/gallon or kg/liter.

W<sub>i</sub> is the mass fraction of organic HAP in material "i" as calculated in d. above, in pound/pound or kg/kg.

r is the number of coatings, the number of thinners/additives, or the number of cleanup/purge materials used during the month, each source (coating, thinner/additive, cleanup/purge) calculated separately for its HAP.

- g. the total mass of organic HAP emissions for each month, calculated as follows:

$$\text{HAPTOT} = \text{HAP}_c + \text{HAP}_t + \text{HAP}_{cu} - R_w$$

where:

HAPTOT is the total mass of organic HAP emissions for the month, in pound or kg.

HAP<sub>c</sub> is the total mass of organic HAP in all the coatings used during the month, summed from the total mass of HAP calculated from all the coatings applied, as required in f. above, in pound or kg.

HAP<sub>t</sub> is the total mass of organic HAP in all the thinners and additives used during the month, summed from the total mass of HAP calculated from all the thinners/additives applied, as required in f. above, in pound or kg.

HAP<sub>cu</sub> is the total mass of organic HAP in all cleanup and purge materials used during the month, summed from the total mass of HAP calculated from all the cleanup/purge materials applied, as required in f. above, in pound or kg.



Rw is the total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste treatment, storage, and disposal facility (TSDF) for treatment or disposal during the compliance period, in pound or kg (the value of zero shall be assigned to Rw if the requirements for the allowance cannot be met, as required in this permit, or if these materials are not collected for recovery or disposal).

- h. the total mass of coating solids applied during the month, calculated as follows:

$$M_s = \sum (VOL_h) (D_h) (M_h)$$

where:

sum is from h=1 to h=m

M<sub>s</sub> is the total mass of coating solids used during the month, in pound or kg.

VOL<sub>h</sub> is the total volume of coating "h" used during the month, as documented in b. above, in gallons or liters.

D<sub>h</sub> is the density of coating "h", as documented in c. above, in pounds/gallon or kg/liter.

M<sub>h</sub> is the mass fraction of coating solids for coating "h", pound of solids per pound of coating or kg of solids per kg coating, calculated as required in e. above.

m is the number of coatings applied during the month.

- i. the total organic HAP emission rate for the 12-month compliance period, in pound of HAP per pound of coating solids or kg of HAP per kg of coating solids applied during the rolling, 12-month compliance period, calculated as follows:

$$HAP_{comply} = \sum (HAPTOT, y) / \sum (M_s, y)$$

where:

sum is from y=1 to y=n

HAP<sub>comply</sub> is the total organic HAP emission rate for the 12-month compliance period, in pound organic HAP emitted per pound of coating solids applied or kg organic HAP emitted per kg of coating solids applied.

HAPTOT, y is the total mass of organic HAP emissions from all materials used during month y, calculated in g. above, in pound or kg.

M<sub>s, y</sub> is the total mass of coating solids used during month y, calculated in h. above, in pound or kg.

y is the identifier for the month.



n is the number of full or partial months in the compliance period; for the initial compliance period, n equals 13 where the compliance date does not fall on the first day of the month; for all following compliance periods n equals 12; and

- j. all calculations required above for each monthly rolling, 12-month compliance period.

In order to demonstrate continuous compliance, the organic HAP emission rate for each rolling, 12-month compliance period must be less than or equal to the applicable emission limit in 40 CFR 63.4490. The compliance demonstration shall be conducted on a monthly basis, using the data from the previous 12 months of operation, as documented through the above calculations and records.

Each record shall be maintained for 5 years following the date of the occurrence, measurement, maintenance, corrective action, report, or record. These records must be kept on-site for the first two years of this 5-year period of time.

- (5) The permittee shall maintain records to demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable limitation contained in this NESHAP and permit; and that no thinner, additive, and/or cleanup/purge material used in the coating operations contains organic HAP at 1.0% or more by mass and no HAP defined by the Occupational Safety and Health Administration (OSHA) as a carcinogen, in 29 CFR 1910.1200(d)(4), equal to or greater than 0.1% by mass. Each record shall be maintained for 5 years following the date of application of the coating.
- (6) The permittee shall also maintain the following records for the plastic parts coating line:
  - a. a copy of each notification, report, and the supporting documentation used to demonstrate that each coating met the applicable limitation in 40 CFR 63.4490 or a record of each rolling 12-month calculation of the total mass of organic HAP emissions used to comply with the NESHAP;
  - b. if using the predominant activity alternative under 40 CFR 63.4490(c)(1), the records of the data and calculations used to determine the predominant activity;
  - c. if using the "facility-specific" emission limit under 40 CFR 63.4490(c)(2), the data used to calculate the "facility-specific" emission limit; and
  - d. the date, time, and duration of use, and the amount of any material applied in the compliant coating operations that did not meet the requirements of the "compliant material" option.

If demonstrating compliance with a predominant activity determination or a "facility-specific" emission limit, all coating operations included in the predominant activity determination or calculation of the "facility-specific" emission limit must comply with the applicable limit and requirements for the "compliant material" option.

Each record shall be maintained for 5 years following the date of the occurrence, measurement, maintenance, corrective action, report, or record. These records must be kept on-site for the first two years of this 5-year period of time.



A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or one can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets or VOC data sheets typically include a listing of the solids and solvents contained in the coatings and cleanup/purge materials.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that include the following information:
  - a. any day during which a photochemically reactive material was employed and the OC emissions for each such day;
  - b. any day in which a HAP-containing reduction solvent or cleanup material was employed and the individual HAP emissions for each such day;
  - c. any month in the quarter during which the rolling twelve month total HAP emissions across all coating operations exceeded 0.16 pounds of HAP per pound of coating solids applied;
  - d. any exceedance of VOC emission limits for coating or cleanup, and the amount of such exceedance; and,
  - e. if no deviations, report no deviations.
- (2) The permittee shall notify the Toledo Division of Environmental Services in writing of any daily record showing that the particulate control filter was not in service when the emission unit was in operation. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 30 days after the event occurs.
- (3) The permittee shall submit an initial notification of compliance status no later than 30 calendar days following the end of the initial compliance period (documented in the "Additional Terms and Conditions" section of this permit). The initial notification of compliance shall contain the following information for the "compliant coating" option:
  - a. company name and address;
  - b. statement by a responsible official certifying the truth, accuracy, and completeness of the content of the report (official's name, title, and signature);
  - c. the date of the report and beginning and ending dates of the reporting period;
  - d. identification of each coating operation using the "compliant material" option;
  - e. a statement as to whether each coating met the emission limitation for the initial compliance period and if any thinner, additive, and/or cleanup material contained any organic HAP;
  - f. if there was a deviation during the initial compliance period, a description of the deviation and statement of the cause and the calculations of emissions used to determine noncompliance with the applicable limits;



- g. calculations and/or supporting documentation (information from supplier or manufacturer or summary of testing results) for the following:
    - i. mass fraction of organic HAP for one representative coating, one thinner and/or additive, and one cleanup/purge material;
    - ii. the mass fraction of coating solids for the representative coating;
    - iii. the density for the representative coating; and
    - iv. the calculation of the organic HAP content for the representative coating, for demonstration of compliance with the limitation, in kg (lb) organic HAP per kg (lb) of coating solids;
  - h. if using the predominant activity alternative under 40 CFR 63.4490(c)(1), the data and calculations used to determine the predominant activity; and
  - i. if using the "facility-specific emission limit" alternative under 40 CFR 63.4490(c)(2), the calculation of the "facility-specific" emission limitation.
- (4) The permittee shall submit semiannual reports which shall be postmarked or delivered no later than July 31 or January 31 following the end of each semiannual reporting period (June 30 or December 31). The first semiannual compliance period shall begin the day after the end of the initial compliance period, as describes in this permit. The semiannual report shall contain the following information:
- a. company name and address;
  - b. statement by a responsible official certifying the truth, accuracy, and completeness of the content of the report (official's name, title, and signature);
  - c. the date of the report and beginning and ending dates of the reporting period;
  - d. identification of the compliance method as either the "compliant material" option or the "without add-on control" option;
  - e. statement of whether the affected source achieved the emission limitations for the compliance period;
  - f. the calculation results for each rolling, 12-month organic HAP emission rate during the 6-month reporting period for the uncontrolled coating operations or the limitation from 40 CFR 63.4490 for each type of compliant coating applied;
  - g. if using the predominant activity alternative according to 40 CFR 63.4490(c)(1), the annual determination of predominant activity if it was not included in the previous semi-annual compliance report;
  - h. if using the "facility-specific emission limit" alternative according to 40 CFR 63.4490(c)(2), the calculation of the "facility-specific" emission limit for each 12-month compliance period during the 6-month reporting period;
  - i. if there were no deviations, a statement that there were no deviations from the emissions limitations during the reporting period; and



- j. if there were any deviations during the compliance period, the report shall include the following information:
  - i. if using the "compliant material" option the report shall include:
    - (a) an identification of each coating used that deviated from the applicable emission limit, and each thinner/additive, and cleaning material used that contained organic HAP and the dates and times each was used;
    - (b) the calculation of the organic HAP content for each coating that deviated from the applicable limit, kg (lb) organic HAP per liter (gallon) of coating solids;
    - (c) the determination of the mass fraction of organic HAP for each thinner, additive, and cleaning material used during the time of deviation; and
    - (d) a statement of the cause of each deviation;
  - ii. deviations from coating applications without add-on control shall include the following information:
    - (a) the beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit;
    - (b) the calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred, including emissions from coatings, thinners/additives, and cleaning materials used each month of deviation from the applicable limitation(s);
    - (c) if applicable, the calculation used to determine mass of organic HAP in waste materials; and
    - (d) a statement of the cause of each deviation.
- (5) The permittee shall identify in the semiannual reports any period of time where a coating was applied that exceeded the organic HAP content limitation contained in this NESHAP and/or a thinner, additive, and/or cleaning/purge material was applied that contained organic HAP as defined in this permit. The report shall document the date and duration of the exceedance, as well as the mass average organic HAP content calculation for the compliance period during which the exceedance occurred.
- (6) The permittee shall submit an initial notification of compliance status report no later than 30 calendar days following the end of the initial compliance period (documented in the "Additional Terms and Conditions" of this permit). The initial notification of compliance shall contain the following information for the "without add-on controls" option:
  - a. company name and address;



- b. statement by a responsible official certifying the truth, accuracy, and completeness of the content of the report (official's name, title, and signature);
- c. the date of the report and beginning and ending dates of the reporting period;
- d. identification of the compliance method for each coating operation, i.e., if using "compliant materials"; the capture and control device(s) employed and the estimated or demonstrated efficiency of each; a statement as to if cleanup solvents were collected for recovery or disposal and if they were shipped to a certified hazardous waste TSDF; and if solvent recovery using liquid-liquid material balance was applied for an emission reduction;
- e. statement of whether the affected source achieved the emission limitations for the initial compliance period;
- f. if there was a deviation during the initial compliance period, a description of the deviation and statement of the cause and the calculations of emissions used to determine noncompliance with the applicable limitations;
- g. calculations and supporting documentation for the coatings, thinners, and cleanup materials applied (information from supplier or manufacturer or summary of testing results) and waste materials sent to a hazardous waste TSDF, if used, to include the following:
  - i. mass fraction of organic HAP for one coating, one thinner and/or other additive, and one cleanup/purge material;
  - ii. the mass fraction of coating solids for one coating;
  - iii. density for one coating, one thinner and/or other additive, and one cleanup/purge material; and
  - iv. the average amount of waste materials collected in any month and average mass of organic HAP contained in the waste materials sent off-site to a hazardous waste TSDF;
- h. for coating operations meeting the emissions limitation without add-on controls, the calculations of the total organic HAP emission rate for the 12-month compliance period, from the coatings, thinners/additives, and cleaning materials used each month, to include:
  - i. the calculations of the total mass of coating solids used each month;
  - ii. the calculations of the total mass of organic HAP emissions for each month; and
  - iii. the calculation of the initial 12-month organic HAP emission rate;
- i. for coating operations meeting the emissions limitation with add-on controls the calculations of the total organic HAP emission rate for the 12-month compliance period, from the coatings, thinners/additives, and cleaning materials used each month, to include:



- i. the calculations of the total mass of coating solids used each month;
  - ii. the calculations of the mass of organic HAP emission reduction for each month for the emission capture systems and add-on control devices;
  - iii. the calculations of the mass of organic HAP emission reduction for each month for each coating operation using a solvent recovery system using liquid-liquid material balance;
  - iv. the calculations of the total mass of organic HAP emissions for each month; and
  - v. the calculation of the initial 12-month organic HAP emission rate;
- j. information for the add-on-controls and capture system, excluding the solvent recovery systems using a liquid-liquid material balance (maintained in another term):
- i. a summary of the data and copies of the calculations supporting the determination that each emissions capture system is a permanent total enclosure or a measurement of the emission capture system's efficiency, including the protocol/procedures followed;
  - ii. a summary of the results of any capture efficiency tests conducted and performance test conducted on each add-on control device; and
  - iii. a list of each emission capture system's and add-on control device's operating limits and summary of the data used to establish these parameter limitations;
- k. a statement of whether or not the work practice plan was developed and implemented;
- l. if using the predominant activity alternative under 40 CFR 63.4490(c)(1), the data and calculations used to determine the predominant activity; and
- m. if using the "facility-specific emission limit" alternative under 40 CFR 63.4490(c)(2), the calculation of the "facility-specific" emission limitation.
- (7) The permittee shall submit or has submitted an initial notification report as required by 40 CFR 63.4510(b). This notification would be submitted as a permit to install for a new source; or for an existing source, this notification should have been submitted by April 19, 2005. The initial notification shall include the following information:
- a. the name and address of the owner or operator;
  - b. the address, i.e., the physical location of the affected source;
  - c. an identification of the relevant standard (NESHAP) that is the basis of the notification and the compliance date;
  - d. a brief description of the nature, size, design, and method of operation of the source, including its operating design capacity and an identification of each point



of emission for each hazardous air pollutant or a preliminary identification of each such point;

- e. a statement of whether the affected source is a major source or an area source; and
- f. the anticipated startup of the emissions unit following the issuance of the permit (or the date when construction or reconstruction was commenced if prior to the issuance of a permit).

A notification of the actual date of startup of the emissions unit shall be delivered to the appropriate Ohio EPA District Office or local air agency or postmarked within 15 calendar days following the startup date of the affected source.

f) Testing Requirements

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

a. Emission Limitation:

15.0 pounds of VOC per hour, excluding emissions from cleanup materials.

Applicable Compliance Method:

Compliance shall be determined by dividing the daily VOC emissions by the number of actual hours that the emissions unit was in operation that day for both when the associated oven (P014) was in operation and when NOT in operation as recorded in d)(1). Compliance shall be based on the following formula:

$$[0.95 \times d)(1)e. + d)(1)f.] / d)(1)g.$$

The emissions calculated when P014 is in operation shall be "split" between this emissions unit and P014, with 95% of the emissions applied to this emission unit.

b. Emission Limitation:

65.7 tons of VOC per year, excluding emissions from cleanup materials.

Applicable Compliance Method:

The annual emissions limitation was based on the hourly limit (15.0 pounds per hour) multiplied by 8760 hours per year and divided by 2000 pounds per ton. Therefore, compliance with the hourly emission limitation serves as demonstration of compliance for the annual emission limitation.

c. Emission Limitation:

104.9 pounds of VOC per month from cleanup materials.



Applicable Compliance Method:

Compliance shall be determined in accordance with the record keeping requirements specified in d)(1)j, based upon the following equation:

$$E_s = V_s \cdot C_s - V_w \cdot C_w,$$

where:

$E_s$  = The pounds of VOC emissions from cleanup per month.

$V_s$  = The gallons of cleanup solvent used per month.

$C_s$  = The pounds of VOC per gallon of cleanup solvent.

$V_w$  = The gallons of spent cleanup solvent recovered for waste disposal.

$C_w$  = The pounds of VOC per gallon of spent cleanup solvent.

d. Emission Limitation:

0.63 tons of VOC per year from cleanup materials.

Applicable Compliance Method:

The annual emissions limitation was based on the monthly limit (104.9 pounds VOC per month) multiplied by 12 months per year and divided by 2000 pounds per ton. Therefore, compliance with the monthly emission limitation serves as demonstration of compliance for the annual emission limitation.

e. Emission Limitation:

VE shall not exceed 20% opacity of visible PE, as a 6-minute average.

Applicable Compliance Method:

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

f. Emission Limitation:

0.551 pound of PE per hour.

Applicable Compliance Method:

To determine the worst case PE rate, the following equation shall be used:

$$E = \text{maximum coating solids usage rate, in pounds per hour (49.63 lb PM/hr)} \times (1-TE) \times (1-CE)$$

where:

$E$  = PE rate (lbs/hr);



TE = fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (0.55); and

CE = fractional control efficiency of the control equipment (0.99).

When requested by the Ohio EPA, the permittee shall demonstrate compliance with the above emissions limitation pursuant to OAC rule 3745-17-03(B)(10).

g. Emission Limitation:

0.16 pounds of HAP per pound of coatings solids

Applicable Compliance Method:

Compliance shall be determined in accordance with the methods set forth in 40 CFR 63 Subpart PPPP under the "compliant coatings" or "emission rate without add-on controls" options, as appropriate.

g) Miscellaneous Requirements

- (1) The terms and conditions contained in this permit to install for emission unit K001 shall supercede all requirements for emission unit K001 contained in Permit to Install 04-01457 (issued 12/5/2006).
- (2) When the associated drying oven (P014) is operating, for purposes of calculating the organic compound emission rates for this emissions unit and the associated oven (P014), the permittee shall utilize a value of 95% as the maximum percentage of the organic compounds employed in this emissions unit that are emitted uncontrolled from the emissions unit. The remaining 5% of the organic compounds employed in this emissions unit shall be considered to be the uncontrolled emissions for the associated oven. This Asplit@ of organic compound emissions between this emissions unit and the associated oven is based upon the amount reported in application.



**2. K002, Custom Paint Line**

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

Custom Coating Line for fiberglass reinforced pultruded styrene resin to modified to account for operations of drying oven (P014).

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	See B.2.
b.	40 CFR Part 63 Subpart PPPP	Organic HAP emissions from all coating operations onsite shall not exceed 0.16 pounds of organic HAP emissions per pound of coating solids applied during each 12-month compliance period.  See c)(3) and b)(2)b.
c.	40 CFR Part 63 Subpart A	See b)(2)c.
d.	OAC rule 3745-17-07(A)(1)	Visible emissions (VE) from this emissions unit shall not exceed 20% opacity as a 6-minute average.
e.	OAC rule 3745-17-11(B)(1)	Particulate Emissions (PE) shall not exceed 0.551 pound per hour.
g.	OAC rule 3745-21-07(G)(2)	Volatile Organic Compound (VOC) emissions shall not exceed 8.0 pounds per hour and 40.0 pounds per day. See b)(2)d.
i.	OAC rule 3745-31-05(A)(3)(a)(ii)	See b)(2)a.
j.	OAC rule 3745-114-01	See b)(2)e.

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) does not apply to the uncontrolled particulate and OC emissions from this coating line since the potential to emit for particulate and OC emissions is less than ten tons per year.



- b. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products, as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart PPPP.

The final rules found in 40 CFR Part 63, Subpart PPPP establish national emission standards for hazardous air pollutants (HAP), work practice standards, operating limitations, and compliance requirements for plastic parts coating operations. The affected source is the collection of all of the following operations for or from the surface coating of plastic parts and products:

- i. all coating operations as defined in 40 CFR 63.4581;
- ii. all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed;
- iii. all manual and automated equipment and containers used for conveying coatings, thinners, other additives, purge, and cleaning materials; and
- iv. all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by the coating operations.

The permittee shall be subject to the requirements and limitations of this NESHAP on December 5, 2007, at which time the initial compliance period begins for the coating operations; and the initial compliance period ends on December 30, 2008.

The permittee, using the "compliant material" option, shall not apply any coating in the coating operation(s) with an organic HAP content greater than or equal to the limitation(s) contained in 40 CFR 63.4490; and all the thinners, additives, and cleaning/purge materials applied shall not contain organic HAP. If any individual coating applied does not meet the limitation of the rule, or any thinner, additive, and/or cleaning/purge material contains organic HAP, the mass average organic HAP emission rate shall be calculated as required in 40 CFR 63.4551 and 63.4552 for the compliance period.

If the permittee chooses to use the "compliant coating option" for any coating or a group of coatings, in order to demonstrate compliance with this NESHAP, such coating operation(s) shall not apply any coating with an organic HAP content greater than or equal to the limitation(s) contained in 40 CFR 63.4490; and all the thinners, additives, and cleaning/purge materials applied shall not contain organic HAP. If any individual material, used within a group of materials applied in the "compliant coating operation", exceeds the emission limitation for that coating group; or a thinner, additive, or cleaning/purge material containing an organic HAP is applied, the mass average organic HAP content for the coating operations must be calculated as required in this permit.

For any coating operation(s) that is meeting the emission limitations in 40 CFR 63.4490 by using the "without add-on control" option, the permittee shall maintain the emissions unit(s) in compliance with the applicable emission limitation at all times, as determined at the end of each month and on a rolling, 12-month basis



following the initial compliance period, i.e., the mass average organic HAP emission rate shall be calculated each month as required in 40 CFR 63.4551 and 63.4552.

- c. Table 2 to 40 CFR Part 63, Subpart PPPP shows which sections of the General Provisions in 40 CFR Part 63, Subpart A apply to this emission unit.
- d. Only OC emissions that are photochemically reactive in this unit are assumed to be VOC emissions and subject to OAC rule 3745-21-07(G)(2).

Each day that a photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] is employed, the volatile organic compound (VOC) emissions from all coatings and photochemically reactive cleanup materials shall not exceed 8 pounds per hour and 40 pounds per day. OC emissions from coatings, thinners, and cleanup material that are not a photochemically reactive material shall not be included in showing compliance with these emission limitations.

The VOC emission limitations of 8 pounds per hour and 40 pounds per day when photochemically reactive coatings or clean up materials are employed shall cease to be effective and federally enforceable on the date the U.S. EPA approves the revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, the emission limitations, monitoring, record keeping, reporting and testing requirements related to these hourly and daily limitations included in d)(1), e)(2)a., e)(2)c., f)(1)d. shall be void.

- e. Per engineering guide #70, emission units subject to a MACT standard are exempt from air toxic modeling. This emission unit is subject to 40 CFR Part 63 Subpart PPPP.

c) Operational Restrictions

- (1) The permittee shall operate the paint booth fabric filter system whenever this emissions unit is in operation.
- (2) Cleanup solvents that are photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5) shall not be used in this emission unit.
- (3) Cleanup solvent and reduction solvent shall not contain HAP.
- (4) Every individual coating used in the "compliant coating operations" must meet the emission limitation(s) contained in 40 CFR 63.4490; and all the thinners, additives, and cleaning/purge materials applied shall not contain organic HAP. Any coating operation meeting these limitations, for each material applied, shall not be required to meet the operating limits in 40 CFR 63.4492 or work practice standards in 40 CFR 63.4493.
- (5) The permittee shall operate and maintain, at all times, any emissions unit contained in this permit (including the associated air pollution control equipment and monitoring equipment) in a manner consistent with safety and good air pollution control practices for minimizing emissions. During a period of startup, shutdown, or malfunction, this general duty to minimize emissions requires that the operator/permittee reduce emissions to the



greatest extent which is consistent with safety and good air pollution control practices. Malfunctions must be corrected as soon as practicable after their occurrence.

The requirement to minimize emissions during any period of startup, shutdown, or malfunction does not require the permittee to achieve emission levels that would be required by the applicable standard at other times, if it is not consistent with safety and good air pollution control practices; nor does it require the operator/permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved. The operational and maintenance requirements contained in the NESHAP are enforceable, independent of the emissions limitations or other requirements of the rule.

Determination of whether such operation and maintenance procedures are being applied shall be based on information requested by and made available to the director (appropriate Ohio EPA Division of Air Pollution Control District Office or local air agency), which may include, but shall not be limited to: monitoring results, operation and maintenance procedures (including the startup, shutdown, and malfunction plan or other standard operating procedures), operation and maintenance records, and inspection of the facility.

- (6) If the permittee can meet the emission limitation(s) contained in 40 CFR 63.4490 without add-on controls, by calculating the rolling, 12-month HAP emission rate at the end of each month, the permittee shall not be required to meet the operating limits contained in 40 CFR 63.4492 or work practice standards contained in 40 CFR 63.4493.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for the coating operation:
- a. The company identification for each coating and reduction solvent, including verification that the coating, as applied, is a photochemically reactive material and the reduction solvent contains no HAP;
  - b. the number of gallons of each coating employed for each day, as applied, while the associated oven (P014) was in operation;
  - c. the number of gallons of each coating employed for each day, as applied, while the associated oven (P014) was NOT in operation;
  - d. the organic compound content of each coating employed, in pounds per gallon as applied;
  - e. The total organic compound emission rate for all coatings while the associated oven (P014) was in operation, in pounds per day (b. x d.);
  - f. The total organic compound emission rate for all coatings while the associated oven (P014) was NOT in operation, in pounds per day (c. x d.);
  - g. The total number of hours the emissions unit was in operation each day;
  - h. The individual HAP and total HAP content of each coating in pounds per gallon as applied; and



- i. for each month, the following information on cleanup solvent:
  - i. the company identification for each cleanup material used;
  - ii. an identification of whether or not each cleanup material employed is photochemically reactive or contains HAP;
  - iii. the gallons of cleanup material used per month;
  - iv. the pounds of OC per gallon of cleanup material;
  - v. the gallons of spent cleanup material recovered for disposal;
  - vi. the pounds of OC per gallon of spent cleanup material; and
  - vii. the pounds per month of OC emissions from cleanup.
- j. For each year, the tons of OC emitted from coating and cleanup.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, the d)(1)a and d)(1)i.ii. references to photochemically reactive material will be voided entirely.]

- (2) The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.
- (3) The permittee shall collect and record the following information each month for this emissions unit when utilizing the compliant coating option:
  - a. the name and identification number of each coating, thinner (includes any other additives and/or solvent blends), and cleanup/purge material, applied in the plastic parts coating operation(s), including at a minimum:
    - i. information from the supplier or manufacturer,
    - ii. formulation data and/or coating/material testing data,
    - iii. all data, documentation, and/or calculations needed to demonstrate that each coating meets the limits contained in 40 CFR 63.4490 and that each thinner, additive, and cleanup material applied in the plastic parts coating operations contained no organic HAP\*;
  - b. the number of gallons or liters of each coating, thinner/additive, and cleanup/purge material employed;
  - c. the density of each coating, thinner/additive, and cleanup/purge material employed, in kg/liter or pounds/gallon, determined using ASTM Method D1475-98 or from information provided by the supplier or manufacturer of the material;
  - d. the mass fraction of organic Hazardous Air Pollutants (HAP) for each coating, thinner/additive, and cleanup/purge material applied during the month, as a weight fraction, i.e., pound of HAP/pound of coating or kg HAP/kg coating, using one of the following methods:



- i. Method 311 from 40 CFR Part 63, Appendix A;
  - ii. Method 24 from 40 CFR Part 60, Appendix A if all nonaqueous volatile matter is to be used for the mass fraction of HAP; or
  - iii. information from the supplier or manufacturer of the materials, where the mass fraction of organic HAP can be calculated from the density and the mass of HAP per gallon of each material (pound HAP/gallon of material pounds/gallon of material, or calculated in kg/liter);
- e. the mass fraction of coating solids (pound of coating solids/pound of coating or kg of coating solids /kg coating) for each coating applied, determined using one of the following methods:
- i. Method 24 from 40 CFR Part 60, Appendix A; or
  - ii. information from the supplier or manufacturer of the coatings, where the mass fraction of coating solids can be calculated from the density and the mass of solids per gallon of each material (pound solids/gallon of coating pounds/gallon of coating, or calculated in kg/kg);
- f. the organic HAP content of each coating, in pound of organic HAP emitted per pound of coating solids used or kg of organic HAP emitted per kg of coating solids used, calculated as follows for each coating applied in the plastic parts coating operations using the "compliant material" option:

$$H_c = W_c / S_c$$

where:

$H_c$  is the organic HAP content of coating "c", in kg organic HAP emitted per kg of coating solids used or pound of organic HAP emitted per pound of coating solids used.

$W_c$  is the mass fraction of organic HAP in coating "c", kg HAP per kg coating or pound of HAP per pound of coating, as determined in d. above.

$S_c$  is the mass fraction of coating solids in coating "c", kg coating solids per kg coating or pound of coating solids per pound of coating, as determined in e. above; and

- g. all calculations required by this permit for each rolling 12-month compliance period.

In order to demonstrate continuous compliance, the calculated organic HAP content ( $H_c$ ) for each coating used must be less than or equal to the applicable emission limit in 40 CFR 63.4490; and each thinner and/or other additive, and cleaning material used during the each compliance period (each month) must contain no organic HAP. These records shall constitute a separate initial compliance demonstration for each coating applied.



Each record shall be maintained for 5 years following the date of the occurrence, measurement, maintenance, corrective action, report, or record. These records must be kept on-site for the first two years of this 5-year period of time.

\*No organic HAP means no HAP at 1.0% or more by mass and no HAP defined by the Occupational Safety and Health Administration (OSHA) as a carcinogen, in 29 CFR 1910.1200(d)(4), equal to or greater than 0.1% by mass.

- (4) The permittee shall collect and record the following information each month for this emissions unit when utilizing the "without add-on controls" option:
- a. the name and identification number of each coating, thinner (includes any other additives and/or solvent blends), and cleanup/purge material, applied in the plastic parts coating operation(s), including information from the supplier or manufacturer, formulation data, and/or coating/material testing data;
  - b. the number of gallons or liters of each coating, thinner/additive, and cleanup/purge material employed;
  - c. the density of each coating, thinner/additive, and cleanup/purge material employed, in kg/liter or pounds/gallon, determined using ASTM Method D1475-98 or from information provided by the supplier or manufacturer of the material;
  - d. the mass fraction of organic Hazardous Air Pollutants (HAP) for each coating, thinner/additive, and cleanup/purge material applied during the month, as a weight fraction, i.e., pound of HAP/pound of coating or kg HAP/kg coating, using one of the following methods:
    - i. Method 311 from 40 CFR Part 63, Appendix A;
    - ii. Method 24 from 40 CFR Part 60, Appendix A if all nonaqueous volatile matter is to be used for the mass fraction of HAP;
    - iii. information from the supplier or manufacturer of the materials, where the mass fraction of organic HAP can be calculated from the density and the mass of HAP per gallon of each material (pounds HAP/gallon of material pounds/gallon of material, or calculated in kg/liter); or
    - iv. solvent blends listed as single components and where neither test data nor manufacturer's data is available, default values from Table 3 to Subpart PPPP or Table 4 if not listed in Table 3, can be used.
  - e. the mass fraction of coating solids (pound of coating solids/pound of coating or kg of coating solids /kg coating) for each coating applied determined using one of the following methods:
    - i. Method 24 from 40 CFR Part 60, Appendix A; or
    - ii. information from the supplier or manufacturer of the coatings, where the mass fraction of coating solids can be calculated from the density and the mass of solids per gallon of each material (pound solids/gallon of coating pounds/gallon of coating, or calculated in kg/kg);



the total mass of organic HAP (pound or kg) in all of the coatings, thinners/additives, and cleanup/purge materials (as purchased) applied during the month, calculated separately for coatings, thinners/additives, and cleanup/purge materials as follows:

$$\text{HAP} = \sum ((\text{VOLi}) (\text{Di}) (\text{Wi}))$$

where:

sum is from  $i=1$  to  $i=r$

HAP is the total mass of organic HAP in the coatings, thinners/additives, and cleanup/purge materials used each month, in pound or kg of HAP for each: 1. the coatings (HAPc), 2. thinners/additives (HAPt), and 3. cleanup/purge materials (HAPcu).

VOLi is the volume of material "i" documented in b. above, in gallons or liters.

Di is the density of material "i" as documented in c. above, in pounds/gallon or kg/liter.

Wi is the mass fraction of organic HAP in material "i" as calculated in d. above, in pound/pound or kg/kg.

r is the number of coatings, the number of thinners/additives, or the number of cleanup/purge materials used during the month, each source (coating, thinner/additive, cleanup/purge) calculated separately for its HAP.

- f. the total mass of organic HAP emissions for each month, calculated as follows:

$$\text{HAPTOT} = \text{HAPc} + \text{HAPt} + \text{HAPcu} - \text{Rw}$$

where:

HAPTOT is the total mass of organic HAP emissions for the month, in pound or kg.

HAPc is the total mass of organic HAP in all the coatings used during the month, summed from the total mass of HAP calculated from all the coatings applied, as required in f. above, in pound or kg.

HAPt is the total mass of organic HAP in all the thinners and additives used during the month, summed from the total mass of HAP calculated from all the thinners/additives applied, as required in f. above, in pound or kg.

HAPcu is the total mass of organic HAP in all cleanup and purge materials used during the month, summed from the total mass of HAP calculated from all the cleanup/purge materials applied, as required in f. above, in pound or kg.

Rw is the total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste treatment, storage, and disposal facility (TSDF) for treatment or disposal during the compliance period, in pound or kg (the value



of zero shall be assigned to  $R_w$  if the requirements for the allowance cannot be met, as required in this permit, or if these materials are not collected for recovery or disposal).

- g. the total mass of coating solids applied during the month, calculated as follows:

$$M_s = \sum (VOL_h) (D_h) (M_h)$$

where:

sum is from  $h=1$  to  $h=m$

$M_s$  is the total mass of coating solids used during the month, in pound or kg.

$VOL_h$  is the total volume of coating "h" used during the month, as documented in (b) above, in gallons or liters.

$D_h$  is the density of coating "h", as documented in c. above, in pounds/gallon or kg/liter.

$M_h$  is the mass fraction of coating solids for coating "h", pound of solids per pound of coating or kg of solids per kg coating, calculated as required in (e) above.

$m$  is the number of coatings applied during the month.

- h. the total organic HAP emission rate for the 12-month compliance period, in pound of HAP per pound of coating solids or kg of HAP per kg of coating solids applied during the rolling, 12-month compliance period, calculated as follows:

$$HAP_{comply} = \sum (HAPTOT, y) / \sum (M_s, y)$$

where:

sum is from  $y=1$  to  $y=n$

$HAP_{comply}$  is the total organic HAP emission rate for the 12-month compliance period, in pound organic HAP emitted per pound of coating solids applied or kg organic HAP emitted per kg of coating solids applied.

$HAPTOT, y$  is the total mass of organic HAP emissions from all materials used during month  $y$ , calculated in g. above, in pound or kg.

$M_s, y$  is the total mass of coating solids used during month  $y$ , calculated in h. above, in pound or kg.

$y$  is the identifier for the month.

$n$  is the number of full or partial months in the compliance period; for the initial compliance period,  $n$  equals 13 where the compliance date does not fall on the first day of the month; for all following compliance periods  $n$  equals 12; and



- i. all calculations required above for each monthly rolling, 12-month compliance period.

In order to demonstrate continuous compliance, the organic HAP emission rate for each rolling, 12-month compliance period must be less than or equal to the applicable emission limit in 40 CFR 63.4490. The compliance demonstration shall be conducted on a monthly basis, using the data from the previous 12 months of operation, as documented through the above calculations and records.

Each record shall be maintained for 5 years following the date of the occurrence, measurement, maintenance, corrective action, report, or record. These records must be kept on-site for the first two years of this 5-year period of time.

- (5) The permittee shall maintain records to demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable limitation contained in this NESHAP and permit; and that no thinner, additive, and/or cleanup/purge material used in the coating operations contains organic HAP at 1.0% or more by mass and no HAP defined by the Occupational Safety and Health Administration (OSHA) as a carcinogen, in 29 CFR 1910.1200(d)(4), equal to or greater than 0.1% by mass. Each record shall be maintained for 5 years following the date of application of the coating.
- (6) The permittee shall also maintain the following records for the plastic parts coating line:
  - a. a copy of each notification, report, and the supporting documentation used to demonstrate that each coating met the applicable limitation in 40 CFR 63.4490 or a record of each rolling 12-month calculation of the total mass of organic HAP emissions used to comply with the NESHAP;
  - b. if using the predominant activity alternative under 40 CFR 63.4490(c)(1), the records of the data and calculations used to determine the predominant activity;
  - c. if using the "facility-specific" emission limit under 40 CFR 63.4490(c)(2), the data used to calculate the "facility-specific" emission limit; and
  - d. the date, time, and duration of use, and the amount of any material applied in the compliant coating operations that did not meet the requirements of the "compliant material" option.

If demonstrating compliance with a predominant activity determination or a "facility-specific" emission limit, all coating operations included in the predominant activity determination or calculation of the "facility-specific" emission limit must comply with the applicable limit and requirements for the "compliant material" option.

Each record shall be maintained for 5 years following the date of the occurrence, measurement, maintenance, corrective action, report, or record. These records must be kept on-site for the first two years of this 5-year period of time.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or one can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets or VOC data sheets typically include a listing of the solids and solvents contained in the coatings and cleanup/purge materials.



- (7) For each day during which the permittee burns a fuel other than natural gas in the 1.8 mmBtu per hour direct gas-fired dryer oven, the permittee shall maintain a record of the type and quantity of fuel burned in the oven.

e) Reporting Requirements

- (1) The permittee shall notify the Toledo Division of Environmental Services in writing of any daily record showing that the particulate control filter was not in service when the emission unit was in operation. The notification shall include a copy of such record and shall be sent to the Toledo Division of Environmental Services within 30 days after the event occurs.
- (2) The permittee shall submit quarterly deviation (excursion) reports that include the following information:
  - a. any exceedance of the OC emission limits for coatings and cleanup materials and the OC emissions for each such day;
  - b. any day in which a HAP-containing reduction solvent or cleanup material was employed and the individual HAP emissions for each such day;
  - c. any time a photochemically reactive material was used as a cleanup solvent and the OC emissions resulting from this material for each such day;
  - d. any month in the quarter during which the rolling twelve month total HAP emissions across all coating operations exceeded 0.16 pounds of HAP per pound of coating solids applied; and
  - e. if no deviations, report no deviations.
- (3) The permittee shall submit an initial notification of compliance status no later than 30 calendar days following the end of the initial compliance period (documented in the "Additional Terms and Conditions" of this permit). The initial notification of compliance shall contain the following information for the "compliant coating" option:
  - a. company name and address;
  - b. statement by a responsible official certifying the truth, accuracy, and completeness of the content of the report (official's name, title, and signature);
  - c. the date of the report and beginning and ending dates of the reporting period;
  - d. identification of each coating operation using the "compliant material" option;
  - e. a statement as to whether each coating met the emission limitation for the initial compliance period and if any thinner, additive, and/or cleanup material contained any organic HAP;
  - f. if there was a deviation during the initial compliance period, a description of the deviation and statement of the cause and the calculations of emissions used to determine noncompliance with the applicable limits;



- g. calculations and/or supporting documentation (information from supplier or manufacturer or summary of testing results) for the following:
    - i. mass fraction of organic HAP for one representative coating, one thinner and/or additive, and one cleanup/purge material;
    - ii. the mass fraction of coating solids for the representative coating;
    - iii. the density for the representative coating; and
    - iv. the calculation of the organic HAP content for the representative coating, for demonstration of compliance with the limitation, in kg (lb) organic HAP per kg (lb) of coating solids;
  - h. if using the predominant activity alternative under 40 CFR 63.4490(c)(1), the data and calculations used to determine the predominant activity; and
  - i. if using the "facility-specific emission limit" alternative under 40 CFR 63.4490(c)(2), the calculation of the "facility-specific" emission limitation.
- (4) The permittee shall submit semiannual reports which shall be postmarked or delivered no later than July 31 or January 31 following the end of each semiannual reporting period (June 30 or December 31). The semiannual report shall contain the following information:
- a. company name and address;
  - b. statement by a responsible official certifying the truth, accuracy, and completeness of the content of the report (official's name, title, and signature);
  - c. the date of the report and beginning and ending dates of the reporting period;
  - d. identification of the compliance method as either the "compliant material" option or the "without add-on control" option;
  - e. statement of whether the affected source achieved the emission limitations for the compliance period;
  - f. the calculation results for each rolling, 12-month organic HAP emission rate during the 6-month reporting period for the uncontrolled coating operations or the limitation from 40 CFR 63.4490 for each type of compliant coating applied;
  - g. if using the predominant activity alternative according to 40 CFR 63.4490(c)(1), the annual determination of predominant activity if it was not included in the previous semi-annual compliance report;
  - h. if using the "facility-specific emission limit" alternative according to 40 CFR 63.4490(c)(2), the calculation of the "facility-specific" emission limit for each 12-month compliance period during the 6-month reporting period;
  - i. if there were no deviations, a statement that there were no deviations from the emissions limitations during the reporting period; and



- j. if there were any deviations during the compliance period, the report shall include the following information:
  - i. using the "compliant material" option the report shall include:
    - (a) an identification of each coating used that deviated from the applicable emission limit, and each thinner/additive, and cleaning material used that contained organic HAP and the dates and times each was used;
    - (b) the calculation of the organic HAP content for each coating that deviated from the applicable limit, kg (lb) organic HAP per liter (gallon) of coating solids;
    - (c) the determination of the mass fraction of organic HAP for each thinner, additive, and cleaning material used during the time of deviation; and
    - (d) a statement of the cause of each deviation;
  - ii. deviations from coating applications without add-on control shall include the following information:
    - (a) the beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit;
    - (b) the calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred, including emissions from coatings, thinners/additives, and cleaning materials used each month of deviation from the applicable limitation(s);
    - (c) if applicable, the calculation used to determine mass of organic HAP in waste materials; and
    - (d) a statement of the cause of each deviation.
- (5) The permittee shall identify in the semiannual reports any period of time where a coating was applied that exceeded the organic HAP content limitation contained in this NESHAP and/or a thinner, additive, and/or cleaning/purge material was applied that contained organic HAP as defined in this permit. The report shall document the date and duration of the exceedance, as well as the mass average organic HAP content calculation for the compliance period during which the exceedance occurred.
- (6) The permittee shall submit an initial notification of compliance status report no later than 30 calendar days following the end of the initial compliance period (documented in the "Additional Terms and Conditions" of this permit). The initial notification of compliance shall contain the following information for the "without add-on controls" option:
  - a. company name and address;



- b. statement by a responsible official certifying the truth, accuracy, and completeness of the content of the report (official's name, title, and signature);
- c. the date of the report and beginning and ending dates of the reporting period;
- d. identification of the compliance method for each coating operation, i.e., if using "compliant materials"; the capture and control device(s) employed and the estimated or demonstrated efficiency of each; a statement as to if cleanup solvents were collected for recovery or disposal and if they were shipped to a certified hazardous waste TSDF; and if solvent recovery using liquid-liquid material balance was applied for an emission reduction;
- e. statement of whether the affected source achieved the emission limitations for the initial compliance period;
- f. if there was a deviation during the initial compliance period, a description of the deviation and statement of the cause and the calculations of emissions used to determine noncompliance with the applicable limitations;
- g. calculations and supporting documentation for the coatings, thinners, and cleanup materials applied (information from supplier or manufacturer or summary of testing results) and waste materials sent to a hazardous waste TSDF, if used, to include the following:
  - i. mass fraction of organic HAP for one coating, one thinner and/or other additive, and one cleanup/purge material;
  - ii. the mass fraction of coating solids for one coating;
  - iii. density for one coating, one thinner and/or other additive, and one cleanup/purge material; and
  - iv. the average amount of waste materials collected in any month and average mass of organic HAP contained in the waste materials sent off-site to a hazardous waste TSDF;
- h. for coating operations meeting the emissions limitation without add-on controls, the calculations of the total organic HAP emission rate for the 12-month compliance period, from the coatings, thinners/additives, and cleaning materials used each month, to include:
  - i. the calculations of the total mass of coating solids used each month;
  - ii. the calculations of the total mass of organic HAP emissions for each month; and
  - iii. the calculation of the initial 12-month organic HAP emission rate;
- i. for coating operations meeting the emissions limitation with add-on controls the calculations of the total organic HAP emission rate for the 12-month compliance period, from the coatings, thinners/additives, and cleaning materials used each month, to include:



- i. the calculations of the total mass of coating solids used each month;
  - ii. the calculations of the mass of organic HAP emission reduction for each month for the emission capture systems and add-on control devices;
  - iii. the calculations of the mass of organic HAP emission reduction for each month for each coating operation using a solvent recovery system using liquid-liquid material balance;
  - iv. the calculations of the total mass of organic HAP emissions for each month; and
  - v. the calculation of the initial 12-month organic HAP emission rate;
- j. information for the add-on-controls and capture system, excluding the solvent recovery systems using a liquid-liquid material balance (maintained in another term):
- i. a summary of the data and copies of the calculations supporting the determination that each emissions capture system is a permanent total enclosure or a measurement of the emission capture system's efficiency, including the protocol/procedures followed;
  - ii. a summary of the results of any capture efficiency tests conducted and performance test conducted on each add-on control device; and
  - iii. a list of each emission capture system's and add-on control device's operating limits and summary of the data used to establish these parameter limitations;
- k. a statement of whether or not the work practice plan was developed and implemented;
- l. if using the predominant activity alternative under 40 CFR 63.4490(c)(1), the data and calculations used to determine the predominant activity; and
- m. if using the "facility-specific emission limit" alternative under 40 CFR 63.4490(c)(2), the calculation of the "facility-specific" emission limitation.
- (7) The permittee shall submit or has submitted an initial notification report as required by 40 CFR 63.4510(b). This notification would be submitted as a permit to install for a new source; or for an existing source, this notification should have been submitted by April 19, 2005. The initial notification shall include the following information:
- a. the name and address of the owner or operator;
  - b. the address, i.e., the physical location of the affected source;
  - c. an identification of the relevant standard (NESHAP) that is the basis of the notification and the compliance date;
  - d. a brief description of the nature, size, design, and method of operation of the source, including its operating design capacity and an identification of each point



of emission for each hazardous air pollutant or a preliminary identification of each such point;

- e. a statement of whether the affected source is a major source or an area source; and
- f. the anticipated startup of the emissions unit following the issuance of the permit (or the date when construction or reconstruction was commenced if prior to the issuance of a permit).

f) Testing Requirements

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

a. Emission Limitation:

VE shall not exceed 20% opacity as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

0.551 lb PE/hour

Applicable Compliance Method:

To determine the worst case PE rate, the following equation shall be used:

$$E = \text{maximum coating solids usage rate, in pounds per hour (49.63 lb PM/hr)} \times (1-TE) \times (1-CE)$$

where:

E = PE rate (lbs/hr);

TE = fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (0.55); and

CE = fractional control efficiency of the control equipment (0.99).

When requested by the Ohio EPA, the permittee shall demonstrate compliance with the above emissions limitation pursuant to OAC rule 3745-17-03(B)(10).

c. Emission Limitation:

0.16 pounds of organic HAP emissions per pound of coating solids for any coating material used during each 12-month compliance period.



Applicable Compliance Method:

Compliance shall be determined in accordance with the methods set forth in 40 CFR 63 Subpart PPPP under the "compliant coatings" or "emission rate without add-on controls" options, as appropriate.

d. Emission Limitation:

8.0 pounds per hour and 40 pounds per day of VOC emissions

Applicable Compliance Method:

Compliance shall be determined in accordance with the record keeping requirements specified in d)(1). The total VOC emissions rate for all coating applied, in pounds per day, shall be based on the following formula:

$$0.95 \times d)(1)e. + d)(1)f.$$

The hourly OC emissions rate for all coating applied, in pounds per hour, shall be based on the following formula:

$$[0.95 \times d)(1)e. + d)(1)f.] / d)(1)g.$$

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, f)(1)d. shall be voided.]

g) Miscellaneous Requirements

- (1) The terms and conditions contained in this permit to install for emission unit K002 shall supercede all requirements for emission unit K002 contained in Permit to Install 04-01457 (issued 12/5/2006).
- (2) When the associated drying oven (P014) is operating, for purposes of calculating the organic compound emission rates for this emissions unit and the associated oven (P014), the permittee shall utilize a value of 95% as the maximum percentage of the organic compounds employed in this emissions unit that are emitted uncontrolled from the emissions unit. The remaining 5% of the organic compounds employed in this emissions unit shall be considered to be the uncontrolled emissions for the associated oven. This Asplit@ of organic compound emissions between this emissions unit and the associated oven is based upon the amounts reported in the application.



**3. P014, Coating Dryer Oven**

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

Direct Gas-Fired Drying Oven associated with K001 and K002 and having a maximum heat rate of 1.8 mmBtu/hr

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)(1)	Visible emissions (VE) from this emissions unit shall not exceed 20% opacity as a 6-minute average.
	OAC rule 3745-18-06(A)	See b)(2)b.
	OAC rule 3745-21-07(G)(1)	Organic Compound (OC) emissions shall not exceed 3.0 pounds per hour and 15.0 pounds per day. See b)(2)d and b)(2)e.
	OAC rule 3745-21-08(B)	See b)(2)c.
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	See b)(2)a.

(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 OC, NOx, CO, and SO2 emissions from the 1.8 mmBtu/hr direct gas-fired drying oven from this air contaminant source since the uncontrolled potential to emit for OC, NOx, CO, and SO2 is each less than 10 tons/year.

b. OAC rule 3745-18-06(A) does not establish SO2 emission limitations for the fuel burning equipment associated with this emissions unit because the emissions unit only employs natural gas as a fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).



- c. The permittee has satisfied the “best available control techniques and operating practices” required pursuant to OAC rule 3745-21-08(B) by the design of the emissions unit and the technology associated with the current operating practices.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio’s State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirements to satisfy the “best available control techniques and operating practices” still exists as part of the federally-approved SIP for Ohio.

- d. The OC emission limitations of 3 pounds per hour and 15 pounds per day when any organic material or substance containing liquid organic material from any article, machine, equipment, or other contrivance comes in contact with flame or is baked, heat-cured, or heat-polymerized, in the presence of oxygen shall cease to be effective and federally enforceable on the date the U.S. EPA approves the revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds. After the rule is removed from the Ohio SIP, the emission limitations, monitoring, record keeping, reporting and testing requirements related to these hourly and daily limitations included in e)(2). and f)(1)b. shall be void.
- e. Only OC emissions that are photochemically reactive in this emissions unit are assumed to be VOC emissions and subject to OAC rule 3745-21-07(G)(1).

c) Operational Restrictions

- (1) The permittee shall only burn natural gas in the 1.8 mmBtu per hour direct gas-fired dryer oven.

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas in the 1.8 mmBtu per hour direct gas-fired dryer oven, the permittee shall maintain a record of the type and quantity of fuel burned in the oven.
- (2) The permittee shall collect and record the following information for each day for the oven:
  - a. the total potential (prior to applying the booth/oven  $\Delta$ split $\text{\textcircled{e}}$ ) uncontrolled daily organic compound emission rate for all coatings employed in coating operations K001 and K002 associated with this emissions unit while this emission unit was in operation, multiplied by the maximum percentage of the emissions associated with this emissions unit (as defined in condition g)(2) of this permit), in pounds per day as shown in the following formula:  
$$[1.d)(1)e. + 2.d)(1)e.] \times 0.05;$$
  - b. the total number of hours this emissions unit was in operation; and



- c. the average hourly organic compound emission rate, i.e., (a/b), in pounds per hour (average).

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in the 1.8 mmBtu per hour direct gas-fired dryer oven as fuel. Each report shall be submitted to the Toledo Division of Environmental Services within 30 days after the deviation occurs.
- (2) The permittee shall submit quarterly deviation (excursion) reports that include the following information:
  - a. an identification of each day during which the average hourly organic compound emissions exceeded 3 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 exceeded 15 pounds per day, and the actual organic compound emissions for each such day.

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

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
  
VE shall not exceed 20% opacity as a 6-minute average.  
  
Applicable Compliance Method:  
  
If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).
  - b. Emission Limitation:  
  
3.0 pounds per hour and 15 pounds per day of OC emissions  
  
Applicable Compliance Method:  
  
Compliance shall be determined in accordance with the record keeping requirements specified in d)(2). The total OC emissions rate for all coating applied, in pounds per day, shall be determined as stated in d)(2)a. and the average hourly OC emissions shall be determined as stated in d)(2)c.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install**  
**Permit Number:** P0104626  
**Facility ID:** 0448011664  
**Effective Date:** 5/28/2009

g) Miscellaneous Requirements

- (1) When this drying oven is operating, for purposes of calculating the organic compound emission rates for this emissions unit and the associated spray booths (K001 & K002), the permittee shall utilize a value of 95% as the maximum percentage of the organic compounds employed in the spray booth that are emitted uncontrolled from the spray booth. The remaining 5% of the organic compounds employed in the spray booth shall be considered to be the uncontrolled emissions for this emissions unit. This split of organic compound emissions between this emissions unit and the associated spray booth is based upon the amounts reported in the application.