



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL  
FAYETTE COUNTY**

**CERTIFIED MAIL**

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:  
Lazarus Gov.  
Center

**Application No: 01-12081**

**Fac ID: 0124010098**

**DATE: 11/30/2006**

Yusa Corporation  
K C Sugita  
151 Jamison Rd SW  
Washington Court House, OH 43160

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$1800** will be due. Please do not submit any payment now.

The Ohio EPA is urging 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 Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

CC: USEPA

CDO

KY

**FAYETTE COUNTY**

PUBLIC NOTICE  
ISSUANCE OF DRAFT PERMIT TO INSTALL **01-12081** FOR AN AIR CONTAMINANT SOURCE FOR  
**Yusa Corporation**

On 11/30/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Yusa Corporation**, located at **151 Jamison Rd SW, Washington Court House, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 01-12081:

**Adhesive spray booths.**

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Isaac Robinson, Ohio EPA, Central District Office, 122 South Front St, P.O. Box 1049, Columbus, OH 43216-1049 [(614)728-3778]



**Permit To Install  
Terms and Conditions**

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

**DRAFT PERMIT TO INSTALL 01-12081**

Application Number: 01-12081  
Facility ID: 0124010098  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Yusa Corporation  
Person to Contact: K C Sugita  
Address: 151 Jamison Rd SW  
Washington Court House, OH 43160

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**151 Jamison Rd SW  
Washington Court House, Ohio**

Description of proposed emissions unit(s):  
**Adhesive spray booths.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described 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

Director

Yusa Corporation

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Part I - GENERAL TERMS AND CONDITIONS

**A. State and Federally Enforceable Permit-To-Install General Terms and Conditions**

**1. Monitoring and Related Recordkeeping 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:
  - i. The date, place (as defined in the permit), and time of sampling or measurements.
  - ii. The date(s) analyses were performed.
  - iii. The company or entity that performed the analyses.
  - iv. The analytical techniques or methods used.
  - v. The results of such analyses.
  - vi. 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:
  - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
  - ii. 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 appropriate Ohio EPA District Office or local air agency. The written

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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 B.9 below if no deviations occurred during the quarter.

- iii. 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 appropriate Ohio EPA District Office or local air agency 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.
  - iv. If this permit is for an emissions unit located at a Title V facility, then 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.

**2. 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 appropriate Ohio EPA District Office or local air agency 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).

**3. 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

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permittee shall comply with the requirement to register such a plan.

#### **4. 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.

#### **5. Severability Clause**

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

#### **6. 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.

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**7. 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.

**8. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that 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. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

**9. Compliance Requirements**

- a. 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.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - i. 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.
  - ii. 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.
  - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

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- iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
  - c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
    - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
    - ii. 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.

#### 10. Permit-To-Operate Application

- a. If 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).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

#### 11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

#### 12. Air Pollution Nuisance

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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.

### **13. Permit-To-Install**

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

## **B. State Only Enforceable Permit-To-Install General Terms and Conditions**

### **1. Compliance Requirements**

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.

### **2. 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 appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (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 appropriate Ohio EPA District Office or local air agency. 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.)

### **3. Permit Transfers**

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

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**4. Authorization To Install or Modify**

If applicable, authorization to install or modify any new or existing 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 modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

**5. Construction of New Sources(s)**

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.

**6. 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.

**7. 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).

**8. Construction Compliance Certification**

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If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) that the facility has been constructed in accordance with the permit-to-install application and the terms and conditions of the permit-to-install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)**

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.

**Yusa Corporation****Facility ID: 0124010098****PTI Application: 01-12081****Issued: To be entered upon final issuance****C. Permit-To-Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)  
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	35.87
PM	9.64

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**Part II - FACILITY SPECIFIC TERMS AND CONDITIONS**

**A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions**

MACT MMMM sets the emission limit for existing affected sources for rubber to metal adhesive coating operations at 37.7 pounds HAP/Gallon of Coating Solids.

The permittee may choose from several compliance options in the final rule to achieve the emission limits. The permittee could comply by applying materials (coatings, thinners and/or other additives, and cleaning materials) that meet the emission limits, either individually or collectively, during each compliance period. The permittee could also use a capture system and add-on control device to meet the emission limits. The permittee could also comply by using a combination of both approaches.

**Operating Limits**

If the permittee reduces emissions by using a capture system and add-on control device (other than a solvent recovery system for which the permittee conducts a liquid-liquid material balance), the operating limits apply to the permittee. These limits are site-specific parameter limits that the permittee determines during the initial performance test of the system. For capture systems that are not permanent total enclosures, the permittee establishes average volumetric flow rates or duct static pressure limits for each capture device (or enclosure) in each capture system. For capture systems that are permanent total enclosures, the permittee establishes limits on average facial velocity or pressure drop across openings in the enclosure.

For thermal oxidizers, the permittee monitors the combustion temperature. For catalytic oxidizers, the permittee monitors the temperature immediately before and after the catalyst bed, or the permittee monitors the temperature before or after the catalyst bed and implement a site-specific inspection and maintenance plan for the catalytic oxidizer. For regenerative carbon adsorbers for which the permittee does not conduct a liquid-liquid material balance, the permittee monitors the carbon bed temperature and the amount of steam or nitrogen used to desorb the bed. For condensers, the permittee monitors the outlet gas temperature from the condenser. For concentrators, the permittee monitors the temperature of the desorption gas stream and the pressure drop across the concentrator.

The site-specific parameter limits that the permittee establishes must reflect operation of the capture system and control devices during a performance test that demonstrates achievement of the emission limits during representative operating conditions.

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Work Practice Standards

If the permittee uses an emission capture system and control device for compliance, the permittee must develop and implement a work practice plan to minimize organic HAP emissions from mixing operations; storage tanks and other containers; and handling operations for coatings, thinners and/or other additives, cleaning materials, and waste materials. If the permittee's affected source has an existing documented plan that incorporates steps taken to minimize emissions from the aforementioned sources, the permittee may be able to use the permittee's existing plan to satisfy the requirement for a work practice plan.

If the permittee uses a capture system and control device for compliance, the permittee is required to develop and operate according to a startup, shutdown, and malfunction plan (SSMP) during periods of startup, shutdown, or malfunction of the capture system and control device.

The NESHAP General Provisions (40 CFR part 63, subpart A) codify certain procedures and criteria for all 40 CFR part 63 NESHAP and apply to the permittee as indicated in the final rule. The General Provisions contain administrative procedures, preconstruction review procedures for new sources, and procedures for conducting compliance-related activities such as notifications, reporting and recordkeeping, performance testing, and monitoring. The final rule refers to individual sections of the General Provisions to emphasize key sections that are relevant. However, unless specifically overridden in the final rule, all of the applicable General Provisions requirements apply to the permittee.

#### Testing and Initial Compliance Requirements

Existing affected sources must be in compliance with the final rule no later than January 2, 2007. New and reconstructed sources must be in compliance upon initial startup of the affected source or by January 2, 2004, whichever is later. However, affected sources are not required to demonstrate compliance until the end of the initial compliance period when they will have accumulated the necessary records to document the rolling 12-month organic HAP emission rate.

Compliance with the emission limits is based on a rolling 12-month organic HAP emission rate determined each month. Each 12-month period is a compliance period. The initial compliance period, therefore, is the 12-month period beginning on the compliance date. If the compliance date occurs on any day other than the first day of a month, then the initial compliance period begins on the compliance date and extends through the end of that month plus the following 12 months. In other words, the initial compliance period could be almost 13 months long, but all subsequent compliance periods will be 12 months long. EPA has defined "month" as a calendar month or a pre-specified period of 28 to 35 days to allow for flexibility at sources where data are based on a business accounting period.

Being "in compliance" means that the owner or operator of the affected source meets the requirements to achieve the final emission limitations during the initial compliance period. However, they will not have accumulated the records for the rolling 12-month organic HAP

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emission rate until the end of the initial compliance period. At the end of the initial compliance period, the owner or operator uses the data and records generated to determine whether or not the affected source is in compliance with the organic HAP emission limit and other applicable requirements for that period. If the affected source does not meet the applicable limit and other requirements, it is out of compliance for the entire compliance period.

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## Emission Limits

There are three options for complying with the final emission limits, and the testing and initial compliance requirements vary accordingly. The permittee may choose to use one compliance option for the entire affected source, or the permittee may use different compliance options for different coating operations within the affected source. The permittee may also use different compliance options for the same coating operation at different times, different compliance options when different coatings are applied to the same part, or when the same coating is applied to different parts. However, the permittee may not use different compliance options at the same time on the same coating operation.

## Option 1: Compliant materials.

This option is a pollution prevention option that allows the permittee to easily demonstrate compliance by using low-HAP or non-HAP coatings and other materials. If the permittee uses coatings that, based on their organic HAP content, individually meet the kilogram (kg) (lb) organic HAP emitted per liter (gal) coating solids used levels in the applicable emission limits and the permittee uses non-HAP thinners and other additives and cleaning materials, this compliance option is available to the permittee. For this option, EPA has minimized recordkeeping and reporting requirements. The permittee may demonstrate compliance by using manufacturer's formulation data and readily available purchase records to determine the organic HAP content of each coating or other material and the amount of each material used. The permittee does not need to perform any detailed emission rate calculations.

If the permittee demonstrates compliance based on the coatings and other materials used, the permittee demonstrates that the organic HAP content of each coating meets the emission limits for the appropriate subcategory as shown in Tables 2 and 3 of this preamble, and that the permittee used no organic HAP-containing thinners and/or other additives, or cleaning materials. For example, if the permittee is using the compliant materials option and the permittee's existing source has magnet wire, rubber-to-metal, extreme performance fluoropolymer, and general use coating operations, the permittee demonstrates that: (1) Each coating used in the magnet wire coating operation has an organic HAP content no greater than 0.12 kg organic HAP/liter coating solids (1.0 lb organic HAP/gal coating solids) used; (2) each coating used in the rubber-to-metal coating operation has an organic HAP content no greater than 4.5 kg organic HAP/liter coating solids (37.7 lbs organic HAP/gal coating solids) used; (3) each coating used in the extreme performance fluoropolymer coating operation has an organic HAP content no greater than 1.5 kg organic HAP/liter coating solids (12.4 lbs HAP/gal coating solids) used; (4) each general use coating has an organic HAP content no greater than 0.31 kg organic HAP/liter coating solids (2.6 lbs HAP/gal coating solids) used; and (5) that the permittee used no organic HAP-containing thinners and/or other additives, or cleaning materials. Note that "no organic HAP" is not intended to mean absolute zero.

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Materials that contain "no organic HAP" means materials that contain organic HAP levels below the levels specified in Sec. 63.3941(a) of the final rule, which are typical Occupational Safety and Health Administration (OSHA) reporting levels for material safety data sheets. These typical reporting levels only count organic HAP that are present at 0.1 percent or more by mass for OSHA-defined carcinogens and at 1.0 percent or more by mass for other compounds.

To determine the mass of organic HAP in coatings, thinners and/or other additives, and cleaning materials and the volume fraction of coating solids, the permittee may rely on manufacturer's formulation data. The permittee is not required to perform tests or analysis of the material if formulation data are available. Alternatively, the permittee could use results from the test methods listed below. The permittee may also use alternative test methods provided the permittee gets EPA approval in accordance with the NESHAP General Provisions, 40 CFR 63.7(f). However, if there is any inconsistency between the test method results (either EPA's or an approved alternative) and manufacturer's data, the test method results prevail for compliance and enforcement purposes, unless, after consultation the permittee demonstrates to the satisfaction of the enforcement agency that the formulation data are correct.

The following test methods are used to determine HAP content. For organic HAP content, use Method 311 of 40 CFR part 63, appendix A. The permittee may also use nonaqueous volatile matter as a surrogate for organic HAP, which includes all organic HAP plus all other organic compounds, excluding water. If the permittee chooses this option, use Method 24 of 40 CFR part 60, appendix A. If the permittee is determining HAP content for reactive adhesives (that is, adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere), the permittee may use the alternative to Method 24 that is included in 40 CFR part 63, subpart PPPP, appendix A. For determining volume fraction of coating solids, use ASTM Method D2697-86 (Reapproved 1998), "Standard Test Method for Volume Nonvolatile Matter in Clear or Pigmented Coatings," or ASTM Method D6093-97 (Reapproved 2003), "Standard Test Method for Percent Volume Nonvolatile Matter in Clear or Pigmented Coatings Using a Helium Gas Pycnometer," an approved alternative method, or calculations based on the volume of the volatile fraction.

Option 2: Compliance based on the emission rate without add-on controls.

This option is a pollution prevention option that allows the permittee to demonstrate compliance based on the organic HAP contained in the mix of coatings, thinners and/or other additives, and cleaning materials the permittee uses. This option offers the flexibility to use some individual coatings that do not, by themselves, meet the kg (lb) organic HAP emitted per liter (gal) coating solids used levels in the applicable emission limits if the permittee uses other low-HAP or non-HAP coatings such that overall emissions from the affected source over a 12-month period meet the emission limits. The permittee must use this option if the permittee uses HAP-containing thinners and/or other additives, and cleaning materials and do not have add-on controls. The permittee tracks of the mass of organic HAP in each coating, thinner or other additive, and cleaning material, and the amount of each material the permittee uses in the permittee's affected source each month of the compliance period. The permittee

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uses this information to determine the total mass of organic HAP in all coatings, thinners and/or other additives, and cleaning materials divided by the total volume of coating solids used during the compliance period. The permittee demonstrates that the permittee's emission rate (in kg (lb) organic HAP emitted per liter (gal) coating solids used) meets the applicable emission limit. The permittee may use readily available purchase records and manufacturer's formulation data to determine the amount of each coating or other material the permittee used and the organic HAP in each material. The final rule contains equations that show the permittee how to perform the calculations to demonstrate compliance.

If the permittee demonstrates compliance using Option 2, the permittee is required to:

- a. Determine the quantity of each coating, thinner and/or other additive, and cleaning material used.
- b. Determine the mass of organic HAP in each coating, thinner and other additive, and cleaning material using the same types of data and methods previously described for Option 1, including the alternative methods for reactive coatings. The permittee may rely on manufacturer's formulation data or the permittee may choose to use test results as described under Option 1.
- c. Determine the volume fraction of coating solids for each coating using the same types of data or methods described under Option 1. In this option, the permittee may include the solids from powder coatings in the compliance calculations. To determine the volume of solids in powder coatings from their weight, use ASTM Method D5965-02, "Standard Test Method for Specific Gravity of Coating Powders."
- d. Calculate the total mass of organic HAP in all materials and total volume of coating solids used each month. The permittee may subtract from the total mass of organic HAP the amount contained in waste materials the permittee sends to a hazardous waste treatment, storage, and disposal facility regulated under 40 CFR part 262, 264, 265, or 266.
- e. Calculate the total mass of organic HAP emissions and total volume of coating solids used for the initial compliance period by adding together all the monthly values for mass of organic HAP and for volume of coating solids used for the 12 months of the initial compliance period.
- f. Calculate the ratio of the total mass of organic HAP emitted for the materials used to the total volume of coating solids used (kg (lb) organic HAP emitted per liter (gal) of coating solids used) for the initial compliance period.
- g. Record the calculations and results and include them in the permittee's Notification of Compliance Status.

Note that if the permittee chooses to use this option for a particular coating operation rather than for all coating operations at the source, the permittee calculates the organic HAP emission rate using just the materials used in that operation. Similarly, if the permittee's facility has multiple coating operations using this option (e.g., a high performance coating operation, a magnet wire coating operation, a rubber-to-metal coating operation, and a general use coating operation), the permittee does a separate calculation for each coating operation to show that each coating operation meets its emission limit. If the permittee is complying with a facility-specific emission limit, the permittee includes all coating operations that are subject to

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the facility-specific emission limit in the compliance calculations.

Option 3: Compliance based on using a capture system and add-on control device.

This option allows sources to use a capture system and an add-on pollution control device, such as a combustion device or a recovery device, to meet the emission limits. While EPA believes that, based on typical emission characteristics, most sources will not use control devices, EPA is providing this option for sources that use control devices. Fewer than 10 percent of the existing sources for which EPA has data use control devices. Under this option, testing is required to demonstrate the capture system and control device efficiencies. Alternatively, the permittee may conduct a liquid-liquid material balance to demonstrate the amount of organic HAP collected by the permittee's recovery device. The final rule provides equations showing the permittee how to use records of materials usage, organic HAP contents of each material, capture and control efficiencies, and coating solids content to calculate the permittee's emission rate during the compliance period.

If the permittee demonstrates compliance based on this option, the permittee demonstrates that the permittee's emission rate considering controls (in kg (lb) organic HAP emitted per liter (gal) of coating solids used) is less than the applicable emission limit. For a capture system and add-on control device, other than a solvent recovery system for which the permittee conducts a liquid-liquid material balance, the permittee's testing and initial compliance requirements are as follows:

- h. Conduct an initial performance test to determine the capture and control efficiencies of the equipment and to establish operating limits to be achieved on a continuous basis. The performance test must be completed no later than the compliance date for existing sources and 180 days after the compliance date for new and reconstructed sources.
- i. Determine the mass of organic HAP in each coating and other material, and the volume fraction of coating solids for each coating used during each month of the initial compliance period.
- j. Calculate the total mass of organic HAP in all coatings and other materials, and total volume of coating solids used each month in the controlled operation or group of coating operations. The permittee may subtract from the total mass of organic HAP the amount contained in waste materials the permittee sends to a hazardous waste treatment, storage, and disposal facility regulated under 40 CFR part 262, 264, 265, or 266.
- k. Calculate the organic HAP emissions from the controlled coating operations each month using the capture and control efficiencies determined during the performance test, and the total mass of organic HAP in materials used in controlled coating operations that month.
- l. Calculate the total mass of organic HAP emissions and total volume of coating solids

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used for the initial compliance period by adding together all the monthly values for mass of organic HAP emissions and for volume of coating solids for the 12 months in the initial compliance period.

- m. Calculate the ratio of the total mass of organic HAP emissions to the total volume of coating solids used during the initial compliance period.
- n. Record the calculations and results and include them in the permittee's Notification of Compliance Status.
- o. Develop and implement a work practice plan to minimize emissions from storage, mixing, and handling of organic HAP-containing materials.

Note that if the permittee chooses to use this option for a particular coating operation rather than for the entire affected source, the permittee calculates the organic HAP emission rate using just the materials used in that operation. Similarly, if the permittee's facility has multiple coating operations using this option (e.g., a high performance coating operation, a rubber-to-metal coating operation, an extreme performance fluoropolymer coating operation, and a general use coating operation), the permittee does a separate calculation for each coating operation to show that each coating operation meets its emission limit. If the permittee is complying with a facility-specific emission limit, the permittee would include all coating operations that are subject to the facility-specific emission limit in the compliance calculations.

If the permittee uses a capture system and add-on control device, other than a solvent recovery system for which the permittee conducts liquid-liquid material balances, the permittee uses specified test methods to determine both the efficiency of the capture system and the emission reduction efficiency of the control device. To determine the capture efficiency, the permittee would either verify the presence of a permanent total enclosure using EPA Method 204 of 40 CFR part 51, appendix M (and all materials must be applied and dried within the enclosure); or use one of three protocols in Sec. 63.3965 of the final rule to measure capture efficiency. If the permittee has a permanent total enclosure and all materials are applied and dried within the enclosure and the permittee routes all exhaust gases from the enclosure to a control device, the permittee assumes 100 percent capture. Magnet wire coating operations may, with approval, conduct representative capture efficiency testing of one magnet wire coating machine out of a group of identical or very similar magnet wire coating machines rather than testing every individual magnet wire coating machine.

To determine the emission reduction efficiency of the control device, the permittee conducts measurements of the inlet and outlet gas streams. The test consists of three runs, each run lasting 1 hour, using the following EPA Methods in 40 CFR part 60, appendix A:

- p. Method 1 or 1A for selection of the sampling sites.
- q. Method 2, 2A, 2C, 2D, 2F, or 2G to determine the gas volumetric flow rate.
- r. Method 3, 3A, or 3B for gas analysis to determine dry molecular weight.
- s. Method 4 to determine stack moisture.
- t. Method 25 or 25A to determine organic volatile matter concentration. Alternatively, any other test method or data that have been validated according to the applicable procedures in Method 301 of 40 CFR part 63, appendix A, and approved by the Administrator, could be used.

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An alternative procedure is provided in appendix A of the final rule for determining the destruction efficiency of oxidizers used to control emissions from magnet wire coating machines. This procedure uses material consumption and material organic volatile content, adjusted to account for any uncaptured emissions, to determine the organic volatile content of the inlet stream to the control device. Magnet wire coating operations may, with approval, conduct representative control device efficiency testing of one magnet wire coating machine out of a group of identical or very similar magnet wire coating machines rather than testing every individual magnet wire coating machine.

If the permittee uses a solvent recovery system, the permittee could choose to determine the overall control efficiency using a liquid-liquid material balance instead of conducting an initial performance test. If the permittee uses the material balance alternative, the permittee is required to measure the amount of all materials used in the controlled coating operations served by the solvent recovery system during each month of the initial compliance period, and to determine the total volatile matter contained in these materials. The permittee also measures the amount of volatile matter recovered by the solvent recovery system during each month of the initial compliance period. Then the permittee compares the amount recovered to the amount used to determine the overall control efficiency each month and apply this efficiency to the total mass of organic HAP in the materials used to determine total organic HAP emissions for the month. The permittee totals these 12 monthly organic HAP emission values and divide by the total of the 12 monthly values for coating solids used to calculate the emission rate for the 12-month initial compliance period. The permittee records the calculations and results and include them in the permittee's Notification of Compliance Status.

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As mentioned above, the permittee establishes operating limits as part of the initial performance test of a capture system and control device, other than a solvent recovery system for which the permittee conducts liquid-liquid material balances. The operating limits are the minimum or maximum (as applicable) values achieved for capture systems and control devices during the most recent performance test, conducted under representative conditions, that demonstrated compliance with the emission limits.

The final rule specifies the parameters to monitor for the types of emission control systems commonly used in the industry. The permittee is required to install, calibrate, maintain, and continuously operate all monitoring equipment according to manufacturer's specifications and ensure that the continuous parameter monitoring systems (CPMS) meet the requirements in Sec. 63.3968 of the final rule. If the permittee uses control devices other than those identified in the final rule, the permittee submits the operating parameters to be monitored to the Administrator for approval. The authority to approve the parameters to be monitored is retained by EPA and is not delegated to States. If the permittee uses a thermal or catalytic oxidizer, the permittee continuously monitors the appropriate temperature and record it at least every 15 minutes. For thermal oxidizers, the temperature monitor is placed in the firebox or in the duct immediately downstream of the firebox before any substantial heat exchange occurs. The operating limit is the average temperature measured during the performance test and for each consecutive 3-hour period; the average temperature has to be at or above this limit. For catalytic oxidizers, temperature monitors are placed immediately before and after the catalyst bed. The operating limits are the average temperature just before the catalyst bed and the average temperature difference across the catalyst bed during the performance test. For each 3-hour period, the average temperature and the average temperature difference must be at or above these limits.

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Alternatively, if the permittee develops and implements an inspection and maintenance plan for the catalytic oxidizer, then the permittee is allowed to monitor only the temperature before the catalyst bed and meet only the temperature operating limit before the catalyst bed and are not required to monitor the difference across the bed.

An alternative procedure for monitoring catalytic oxidizers on magnet wire coating machines is provided in appendix A of the final rule. This alternative allows the permittee to develop and implement an inspection and maintenance plan as described in appendix A of the final rule and to measure the temperature either before or after the catalyst bed and compare the measured temperature to the operating limit.

If the permittee uses a regenerative carbon adsorber and do not conduct liquid-liquid material balances to demonstrate compliance, the permittee monitors the carbon bed temperature after each regeneration and the total amount of steam or nitrogen used to desorb the bed for each regeneration. The operating limits are the carbon bed temperature at the time the carbon bed is returned to service (not to be exceeded) and the amount of steam or nitrogen used for desorption (to be met as a minimum).

If the permittee uses a condenser and do not conduct liquid-liquid material balances to demonstrate compliance, the permittee monitors the outlet gas temperature to ensure that the air

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stream is being cooled to a low enough temperature. The operating limit is the average condenser outlet gas temperature measured during the performance test and for each consecutive 3-hour period, the average temperature must be at or below this limit.

If the permittee uses a concentrator, the permittee monitors the temperature of the desorption concentrate stream and the pressure drop across the concentrator. These values must be recorded at least once every 15 minutes. The operating limits must be the 3-hour average temperature (to be met as a minimum) and the 3-hour average pressure drop (to be met as a minimum) measured during the performance test.

For each capture system that is not a permanent total enclosure, the permittee establishes operating limits for gas volumetric flow rate or duct static pressure for each enclosure or capture device. The operating limit is the average volumetric flow rate or duct static pressure during the performance test, to be met as a minimum. For each capture system that is a permanent total enclosure, the operating limit requires the average facial velocity of air through all natural draft openings to be at least 200 feet per minute or the pressure drop across the enclosure to be at least 0.007 inches water.

An alternative procedure for monitoring capture systems on magnet wire coating machines is provided in appendix A of this rule. This alternative requires the permittee to install an alarm or interlock which will be triggered either when any oven exhaust fan is not operating or the oven is overheating. This alternative also requires the permittee to confirm every 6 months that the oven is operating at negative pressure.

#### Work Practices

If the permittee uses a capture system and control device for compliance, the permittee is required to develop and implement on an ongoing basis a work practice plan for minimizing organic HAP emissions from storage, mixing, material handling, and waste handling operations. This plan must include a description of all steps taken to minimize emissions from these sources (e.g., using closed storage containers, practices to minimize emissions during filling and transfer of contents from containers, using spill minimization techniques, placing solvent-laden cloths in closed containers immediately after use, etc.). The permittee must make the plan available for inspection if EPA requests to see it.

If the permittee uses a capture system and control device for compliance, the permittee is required to develop and operate according to a SSMP during periods of startup, shutdown, or malfunction of the capture system and control device.

#### Continuous Compliance Provisions for Emission Limits

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If the permittee uses the compliant materials option (Option 1), the permittee demonstrates continuous compliance if each coating meets the applicable emission limit and the permittee uses no organic HAP-containing thinners and/or other additives, or cleaning materials. If the permittee uses the emission rate without add-on controls option (Option 2), the permittee demonstrates continuous compliance if, for each 12-month compliance period, the ratio of kg (lb) organic HAP emitted to liter (gal) coating solids used is less than or equal to the applicable emission limit. The permittee follows the same procedures for calculating the organic HAP emitted to coating solids used ratio that the permittee used for the initial compliance period.

For each coating operation on which the permittee uses a capture system and control device (Option 3), other than a solvent recovery system for which the permittee conducts a liquid-liquid material balance, the permittee uses the continuous parameter monitoring results for the month as part of the determination of the mass of organic HAP emissions. If the monitoring results indicate no deviations from the operating limits and there were no bypasses of the control device, the permittee assumes the capture system and control device are achieving the same percent emission reduction efficiency as they did during the most recent performance test in which compliance was demonstrated. The permittee then applies this percent reduction to the total mass of organic HAP in materials used in the controlled coating operations to determine the emissions from those operations during the month. If there were any deviations from the operating limits during the month or any bypasses of the control device, the permittee accounts for them in the calculation of the monthly emissions by assuming the capture system and control device were achieving zero emission reduction during the periods of deviation, unless the permittee has other data indicating the actual efficiency of the emission capture system and add-on control device, and the use of these data is approved by the permittee's permitting authority. Determine the organic HAP emission rate by dividing the total mass of organic HAP emissions for the 12-month compliance period by the total volume of coating solids used during the 12-month compliance period. Every month, the permittee calculates the emission rate for the previous 12-month period.

For each coating operation on which the permittee uses a solvent recovery system and conduct a liquid-liquid material balance each month, the permittee uses the liquid-liquid material balance to determine control efficiency. To determine the overall control efficiency, the permittee must measure the amount of all materials used during each month and determine the volatile matter content of these materials. The permittee must also measure the amount of volatile matter recovered by the solvent recovery system during the month, calculate the overall control efficiency, and apply it to the total mass of organic HAP in the materials used to determine total organic HAP emissions each month. Then the permittee determines the 12-month organic HAP emission rate in the same manner described above.

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### Operating Limits

If the permittee uses a capture system and control device, the final rule requires the permittee to achieve on a continuous basis the operating limits the permittee establishes during the performance test. If the continuous monitoring shows that the capture system and control device are operating outside the range of values established during the performance test, the permittee has deviated from the established operating limits.

If the permittee operates a capture system and control device with bypass lines that could allow emissions to bypass the control device, the permittee demonstrates that captured organic HAP emissions within the affected source are being routed to the control device by monitoring for potential bypass of the control device. The permittee may choose from the following five monitoring procedures:

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- u. Flow control position indicator to provide a record of whether the exhaust stream is directed to the control device.
- v. Car-seal or lock-and-key valve closures to secure the bypass line valve in the closed position when the control device is operating.
- w. Valve closure monitoring to ensure any bypass line valve or damper is closed when the control device is operating.
- x. Automatic shutdown system to stop the coating operation when flow is diverted from the control device.
- y. Flow direction indicator to provide a record of whether the exhaust stream is flowing toward the control device.

A deviation would occur for any period of time the bypass monitoring indicates that emissions are not routed to the control device.

#### Work Practices

If the permittee uses an emission capture system and control device for compliance, the permittee is required to implement, on an ongoing basis, the work practice plan the permittee developed during the initial compliance period. If the permittee did not develop a plan for reducing organic HAP emissions or the permittee does not implement the plan, this would be a deviation from the work practice standard. If the permittee uses a capture system and control device for compliance, the permittee is required to operate according to the permittee's SSMP during periods of startup, shutdown, or malfunction of the capture system and control device.

#### Notification, Recordkeeping, and Reporting Requirements

The permittee is required to comply with the applicable requirements in the NESHAP General Provisions, subpart A of 40 CFR part 63, as described in the final rule. The General Provisions notification requirements include: initial notifications, notification of performance test if the permittee is complying using a capture system and control device, notification of compliance status, and additional notifications required for affected sources with continuous monitoring systems. The General Provisions also require certain records and periodic reports.

#### Initial Notifications.

If the permittee owns or operates an existing affected source, the permittee must send a notification to the EPA Regional Office in the region where the permittee's facility is located and to the permittee's State agency no later than 1 year after publication of the final rule in the Federal Register. For new and reconstructed sources, the permittee must send the notification within 120 days after the date of initial startup or 120 days after publication of the final rule,

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whichever is later. That report notifies us and the permittee's State agency that the permittee has an existing affected source that is subject to the final standards or that the permittee has constructed a new affected source. Thus, it allows the permittee and the permitting authority to plan for compliance activities. The permittee also needs to send a notification of planned construction or reconstruction of a source that would be subject to the final rule and apply for approval to construct or reconstruct.

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If the permittee demonstrates compliance by using a capture system and control device for which the permittee does not conduct a liquid-liquid material balance, the permittee must conduct a performance test. The performance test is required no later than the compliance date for an existing affected source. For a new or reconstructed affected source, the performance test is required no later than 180 days after startup or 180 days after Federal Register publication of the final rule, whichever is later. The permittee must notify EPA (or the delegated State or local agency) at least 60 calendar days before the performance test is scheduled to begin and submit a report of the performance test results no later than 60 days after the test.

**Notification of Compliance Status**

The permittee must submit a Notification of Compliance Status within 30 days after the end of the initial 12- month compliance period. In the notification, the permittee must certify whether each affected source has complied with the final standards; identify the option(s) the permittee used to demonstrate initial compliance; summarize the data and calculations supporting the compliance demonstration; and provide information on any deviations from the emission limits, operating limits, or other requirements.

If the permittee elects to comply by using a capture system and control device for which the permittee conducts performance tests, the permittee must provide the results of the tests. The permittee's notification must also include the measured range of each monitored parameter, the operating limits established during the performance test, and information showing whether the source has complied with its operating limits during the initial compliance period.

If the permittee is complying with a single emission limit representing the predominant surface coating activity under Sec. 63.3890(c)(1) of the final rule, include all calculations and supporting documentation for the predominant activity determination. If the permittee is complying with a facility-specific emission limit under Sec. 63.3890(c)(2) of the final rule, include the calculation of the facility-specific emission limit and any supporting information.

**Recordkeeping Requirements**

The permittee must keep records of reported information and all other information necessary to document compliance with the final rule for 5 years. As required under the General Provisions, records for the 2 most recent years must be kept on-site or be readily accessible from the site (for example, by a computer network); the other 3 years' records may be kept off-site. Records pertaining to the design and operation of the control and monitoring equipment must be kept for the life of the equipment.

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Depending on the compliance option that the permittee chooses, the permittee may need to keep records of the following:

- z. Organic HAP content or volatile organic matter content and coating solids content (for all compliance options).

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- aa. Quantity of the coatings, thinners and/or other additives, and cleaning materials used during each compliance period. If the permittee is using the compliant material option for all coatings at the source, the permittee may maintain purchase records for each material used rather than a record of the volume used.
- bb. For the emission rate (with or without add-on controls) compliance options, calculations of the permittee's emission rate for each 12- month compliance period.
- cc. All documentation supporting initial notifications and notifications of compliance status.

If the permittee demonstrates compliance by using a capture system and control device, the permittee must keep records of the following:

- dd. All required measurements, calculations, and supporting documentation needed to demonstrate compliance with the standards.
- ee. All results of performance tests and parameter monitoring.
- ff. All information necessary to demonstrate conformance with the permittee's plan for minimizing emissions from mixing, storage, and waste handling operations.
- gg. All information necessary to demonstrate conformance with the affected source's SSMP when the plan procedures are followed.
- hh. The occurrence and duration of each startup, shutdown, or malfunction of the emission capture system and control device.
- ii. Actions taken during startup, shutdown, and malfunction that are different from the procedures specified in the affected source's SSMP.
- jj. Each period during which a CPMS is malfunctioning or inoperative (including out-of-control periods).

The final rule requires the permittee to collect and keep records according to certain minimum data requirements for the CPMS. Failure to collect and keep the specified minimum data would be a deviation that is separate from any emission limits, operating limits, or work practice standards.

Deviations, as determined from these records, must be recorded and also reported. A deviation is any instance when any requirement or obligation established by the final rule including, but not limited to, the emission limits, operating limits, and work practice standards, is not met.

If the permittee uses a capture system and control device to reduce organic HAP emissions, the permittee must make the permittee's SSMP available for inspection if the Administrator requests to see it. The plan stays in the permittee's records for the life of the affected source or until the source is no longer subject to the final standards. If the permittee revises the plan, the permittee must keep the previous superseded versions on record for 5 years following the revision.

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If the permittee is using the predominant activity or facility-specific emission limit alternative, the permittee must keep the records of the data and calculations needed to determine the predominant activity or to calculate the facility-specific emission limit for the permittee's facility.

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Periodic Reports

Each reporting year is divided into two semiannual reporting periods. If no deviations occur during a semiannual reporting period, the permittee submits a semiannual report stating that the affected source has been in continuous compliance. If deviations occur, the permittee includes them in the report as follows:

- kk. Report each deviation from the emission limit.
- ll. Report each deviation from the work practice standards if the permittee uses an emission capture system and control device.
- mm. If the permittee uses an emission capture system and control device, other than a solvent recovery system for which the permittee conducts liquid- liquid material balances, report each deviation from an operating limit and each time a bypass line diverts emissions from the control device to the atmosphere.
- nn. Report other specific information on the periods of time the deviations occurred.

The permittee also has to include in each semiannual report an identification of the compliance option(s) the permittee used for each affected source and any time periods when the permittee changed to another compliance option.

Other Reports

The permittee is required to submit reports for periods of startup, shutdown, or malfunction of the capture system and control device. If the procedures the permittee follows during any startup, shutdown, or malfunction are inconsistent with the permittee's SSMP, the permittee report those procedures with the permittee's semiannual reports in addition to immediate reports required by 40 CFR 63.10(d)(5)(ii).

**B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions**

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (K002) - Manual Adhesive Spray Booth controlled with a permanent total enclosure (PTE) and thermal incinerator. The terms and conditions of this permit supercede those identified in PTI No. 01-5631 issued on March 22, 1995.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-02(A)	See A.1.2.a below.
OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 0.551 pound per hour. See A.2.c below.
OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
OAC rule 3745-21-09(U)(1)(d)	The coating(s) applied in this emission unit shall be limited to 6.7 pounds of volatile organic compounds (VOC) per gallon of solids.
40 CFR Part 63, MACT Subpart M	See Part II.A.

**2. Additional Terms and Conditions**

- 2.a Permit to install 01-12081 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):
  - i. the permittee shall control VOC emissions from this emissions unit through the use of a permanent total enclosure (PTE) and a thermal incinerator with a minimum overall control efficiency of 95%.
  - ii. the permittee shall limit emissions to 3.4 tons VOC per year.
- 2.b The PTE serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a permanent total enclosure in 40 CFR, Part 51, Appendix M, Reference Method 204, and shall capture all of the VOC emissions from this emissions unit. The operation, monitoring, recordkeeping and reporting associated with the PTE shall be conducted in accordance with 40

Emissions Unit ID: K002

CFR Part 63, MACT subpart M MMM.

- 2.c The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

## II. Operational Restrictions

None.

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly operate and maintain equipment to continuously monitor and record the thermal incinerator's combustion temperature during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the combustion temperature on a continuous basis.

The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance. (Testing conducted on 7/19/06 indicated an average combustion temperature of ~1625°F.)

Whenever the monitored value for the thermal incinerator deviates from the range specified above the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified above, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the combustion temperature readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

2. The permittee shall collect and record the following information each month for this emissions unit:

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- a. the name and identification of each coating and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed;
  - c. the VOC content of each coating and cleanup material, in pounds per gallon;
  - d. the total uncontrolled VOC emissions from all the coatings employed (i.e., the calculated, controlled VOC emission rate times the total volume of all coatings employed in the line), in pounds or tons; and
  - e. the total controlled VOC emissions from all the coatings and cleanup materials employed, in pounds or tons (2.d multiplied by the control efficiency determined during the most recent stack test that demonstrated the emission unit was in compliance).
- 3.** The permittee shall collect and record the following information each month for the coating line and control equipment:
- a. the name and identification number of each coating, as applied;
  - b. the pounds of VOC per gallon of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating;
  - c. the maximum VOC content (in pounds of VOC per gallon of coating solids, as applied) or the daily volume-weighted average VOC content (in pounds of VOC per gallon of coating solids, as applied) of all the coatings;
  - d. the calculated, controlled VOC emission rate, in pounds of VOC per gallon of coating solids, as applied (the controlled VOC emission rate shall be calculated using (i) either the maximum VOC content or the daily volume-weighted VOC content recorded in accordance with paragraph (c) above and (ii) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance);
  - e. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and
  - f. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the

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most recent emission test that demonstrated that the emissions unit was in compliance.

4. 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.

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**IV. Reporting Requirements**

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
  - a. each period of time when the thermal incinerator's combustion temperature was outside of the acceptable range;
  - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
  - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the combustion temperature into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

2. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the director (the appropriate District Office or local air agency) within 30 days after the event occurs.
3. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the calculated, controlled VOC emission rate exceeds the applicable pounds of VOC per gallon of solids limitation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.
4. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

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**V. Testing Requirements**

1. Compliance with the emission limitations in section A.I of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation -  
VOC emissions shall not exceed 3.4 tons per year, including cleanup material.

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Applicable Compliance Method -

Compliance with the annual limitation shall be based upon the records required pursuant to Section A.III.2 and A.III.3.

The VOC content of the coatings, thinners, other additives, and clean-up materials shall be determined according to OAC rule 3745-21-10(B). USEPA Methods 24 shall be used to determine the VOC contents for coatings. If an owner or operator determines that Method 24 40 CFR Part 60, Appendix A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

b. Emission Limitation -

Particulate emissions shall not exceed 0.551 pound per hour.

Applicable Compliance Method -

To determine compliance with the hourly emission rate for particulates, the following equation shall be used:

$$E = (U) \cdot (D) \cdot (S) \cdot (1 - TE) \cdot (1 - CE)$$

where:

E = particulate matter emission rate (lb/hr)

U = coating usage rate (gal/hr)

D = density of coating (lb/gal)

S = total solids percent by weight of the coating material

TE = transfer efficiency of coating equipment (0.25 for air spray guns)

CE = control efficiency of the control equipment (0.90 for the dry filtration system)

c. Emission Limitation -

Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method

If required, compliance shall be determined through visible emission 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).

d. Emission Limitation -

The coating(s) applied with this emission unit shall be limited to 6.7 pounds of VOC per gallon of solids.

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Applicable Compliance Method -

To determine compliance with the pounds of VOC per gallon of solids content for the coating used with this emission unit, the following equation shall be used:

$$E = (1/S) \cdot (V) \cdot (1 - CE)$$

where:

E = coating content (lb VOC/gallon of solid)

S = solid content of coating by volume

V = VOC content of coating (lb VOC/gal of coating)

CE = control efficiency of the control equipment (0.95 for the thermal incinerator or the control efficiency determined during the most recent stack test that demonstrated the emission unit was in compliance)

e. Emission Limitation -

The use of a PTE and a thermal incinerator with a minimum control efficiency of 95%.

Applicable Compliance Method -

If required, the following test methods shall be employed to demonstrate compliance with the allowable volatile organic compound emission limitation(s): 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25 or 25A, as appropriate. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

**VI. Miscellaneous Requirements**

None

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**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (K002) - Manual Adhesive Spray Booth controlled with a permanent total enclosure (PTE) and thermal incinerator. The terms and conditions of this permit supercede those identified in PTI No. 01-5631 issued on March 22, 1995.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the increase in emissions due to the modification(s) to the

Emissions Unit ID: K021

emissions unit was less than 1 ton per year of each toxic pollutant that has a listed Threshold Limit Value (TLV), as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices").

### Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

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

**Operations, Property, and/or Equipment - (K021) - Small Part Manual Spray Booth (No.3 Primer) controlled with a permanent total enclosure (PTE) and thermal incinerator. The terms and conditions of this permit supercede those identified in PTI No. 01-7333 issued on April 11, 1998.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-02(A)	See A.I.2.a below.
OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 0.551 pound per hour. See A.2.c below.
OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
OAC rule 3745-21-09(U)(1)(d)	The coating(s) applied in this emission unit shall be limited to 6.7 pounds of volatile organic compounds (VOC) per gallon of solids.
40 CFR Part 63, MACT Subpart M	See Part II.A.

#### 2. Additional Terms and Conditions

- 2.a Permit to install 01-12081 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

- i. the permittee shall control VOC emissions from this emissions unit through the use of a permanent total enclosure (PTE) and a thermal incinerator with a minimum overall control efficiency of 95%.

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- ii. the permittee shall limit emissions to 0.17 tons VOC per year.
- 2.b** The PTE serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a permanent total enclosure in 40 CFR, Part 51, Appendix M, Reference Method 204, and shall capture all of the VOC emissions

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from this emissions unit. The operation, monitoring, recordkeeping and reporting associated with the PTE shall be conducted in accordance with 40 CFR Part 63, MACT subpart M.

- 2.c The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall properly operate and maintain equipment to continuously monitor and record the thermal incinerator's combustion temperature during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the combustion temperature on a continuous basis.

The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance. (Testing conducted on 7/19/06 indicated an average combustion temperature of ~1625°F.)

Whenever the monitored value for the thermal incinerator deviates from the range specified above the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified above, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the combustion

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temperature readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

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2. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification of each coating and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed;
  - c. the VOC content of each coating and cleanup material, in pounds per gallon;
  - d. the total uncontrolled VOC emissions from all the coatings employed (i.e., the calculated, controlled VOC emission rate times the total volume of all coatings employed in the line), in pounds or tons; and
  - e. the total controlled VOC emissions from all the coatings and cleanup materials employed, in pounds or tons (2.d multiplied by the control efficiency determined during the most recent stack test that demonstrated the emission unit was in compliance).
  
3. The permittee shall collect and record the following information each month for the coating line and control equipment:
  - a. the name and identification number of each coating, as applied;
  - b. the pounds of VOC per gallon of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating;
  - c. the maximum VOC content (in pounds of VOC per gallon of coating solids, as applied) or the daily volume-weighted average VOC content (in pounds of VOC per gallon of coating solids, as applied) of all the coatings;
  - d. the calculated, controlled VOC emission rate, in pounds of VOC per gallon of coating solids, as applied (the controlled VOC emission rate shall be calculated using (i) either the maximum VOC content or the daily volume-weighted VOC content recorded in accordance with paragraph (c) above and (ii) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance);
  - e. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and
  - f. all 3-hour blocks of time during which the average combustion temperature

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within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

4. 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.

**IV. Reporting Requirements**

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
  - a. each period of time when the thermal incinerator's combustion temperature was outside of the acceptable range;
  - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
  - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the combustion temperature into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

2. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the calculated, controlled VOC emission rate exceeds the applicable pounds of VOC per gallon of solids limitation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.
3. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission

Report.

## V. Testing Requirements

1. Compliance with the emission limitations in section A.I of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation -  
VOC emissions shall not exceed 0.17 tons per year, including cleanup material.

Applicable Compliance Method -

Compliance with the annual limitation shall be based upon the records required pursuant to Section A.III.2 and A.III.3.

The VOC content of the coatings, thinners, other additives, and clean-up materials shall be determined according to OAC rule 3745-21-10(B). USEPA Methods 24 shall be used to determine the VOC contents for coatings. If an owner or operator determines that Method 24 40 CFR Part 60, Appendix A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

- b. Emission Limitation -  
Particulate emissions shall not exceed 0.551 pound per hour.

Applicable Compliance Method -

To determine compliance with the hourly emission rate for particulates, the following equation shall be used:

$$E = (U) \cdot (D) \cdot (S) \cdot (1 - TE) \cdot (1 - CE)$$

where:

E = particulate matter emission rate (lb/hr)

U = coating usage rate (gal/hr)

D = density of coating (lb/gal)

S = total solids percent by weight of the coating material

TE = transfer efficiency of coating equipment (0.25 for air spray guns)

CE = control efficiency of the control equipment (0.90 for the dry filtration system)

- c. Emission Limitation

Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

**Issued: To be entered upon final issuance**Applicable Compliance Method

If required, compliance shall be determined through visible emission 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).

- d. **Emission Limitations -**  
The coating(s) applied with this emission unit shall be limited to 6.7 pounds of VOC per gallon of solids.

Applicable Compliance Method -

To determine compliance with the pounds of VOC per gallon of solids content for the coating used with this emission unit, the following equation shall be used:

$$E = (1/S) \cdot (V) \cdot (1 - CE)$$

where:

E = coating content (lb VOC/gallon of solid)

S = solid content of coating by volume

V = VOC content of coating (lb VOC/gal of coating)

CE = control efficiency of the control equipment (0.95 for the thermal incinerator)

- e. **Emission Limitation -**  
The use of a PTE and a thermal incinerator with a minimum control efficiency of 95%.

Applicable Compliance Method -

If required, the following test methods shall be employed to demonstrate compliance with the allowable volatile organic compound emission limitation(s): 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25 or 25A, as appropriate. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

**VI. Miscellaneous Requirements**

None

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**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (K021) - Small Part Manual Spray Booth (No.3 Primer) controlled with a permanent total enclosure (PTE) and thermal incinerator. The terms and conditions of this permit supercede those identified in PTI No. 01-7333 issued on April 11, 1998.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

- 1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the increase in emissions due to the modification(s) to the emissions unit was less than 1 ton per year of each toxic pollutant that has a listed Threshold Limit Value (TLV), as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook

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entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices").

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (K022) - Small Part Manual Spray Booth (No.3 Adhesive) controlled with a permanent total enclosure (PTE) and thermal incinerator. The terms and conditions of this permit supercede those identified in PTI No. 01-7333 issued on April 11, 1998.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-02(A)	See A.I.2.a below.
OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 0.551 pound per hour. See A.2.c below.
OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
OAC rule 3745-21-09(U)(1)(d)	The coating(s) applied in this emission unit shall be limited to 6.7 pounds of volatile organic compounds (VOC) per gallon of solids.
40 CFR Part 63, MACT Subpart M	See Part II.A.

**2. Additional Terms and Conditions**

- 2.a Permit to install 01-12089 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):
  - i. the permittee shall control VOC emissions from this emissions unit through the use of a permanent total enclosure (PTE) and a thermal incinerator with a minimum overall control efficiency of 95%.

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- ii. the permittee shall limit emissions to 0.20 ton VOC per year.
- 2.b The PTE serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a permanent total enclosure in 40 CFR, Part 51, Appendix M, Reference Method 204, and shall capture all of the VOC emissions from this emissions unit. The operation, monitoring, recordkeeping and reporting associated with the PTE shall be conducted in accordance with 40 CFR Part 63, MACT subpart M.
  - 2.c The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

## II. Operational Restrictions

None

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly operate and maintain equipment to continuously monitor and record the thermal incinerator's combustion temperature during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the combustion temperature on a continuous basis.

The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance. (Testing conducted on 7/19/06 indicated an average combustion temperature of ~1625°F.)

Whenever the monitored value for the thermal incinerator deviates from the range specified above the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified above, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended,

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the total period of time (in minutes) during which there was a deviation, the combustion temperature readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

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2. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification of each coating and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed;
  - c. the VOC content of each coating and cleanup material, in pounds per gallon;
  - d. the total uncontrolled VOC emissions from all the coatings employed (i.e., the calculated, controlled VOC emission rate times the total volume of all coatings employed in the line), in pounds or tons; and
  - e. the total controlled VOC emissions from all the coatings and cleanup materials employed, in pounds or tons (2.d multiplied by the control efficiency determined during the most recent stack test that demonstrated the emission unit was in compliance).
  
3. The permittee shall collect and record the following information each month for the coating line and control equipment:
  - a. the name and identification number of each coating, as applied;
  - b. the pounds of VOC per gallon of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating;
  - c. the maximum VOC content (in pounds of VOC per gallon of coating solids, as applied) or the daily volume-weighted average VOC content (in pounds of VOC per gallon of coating solids, as applied) of all the coatings;
  - d. the calculated, controlled VOC emission rate, in pounds of VOC per gallon of coating solids, as applied (the controlled VOC emission rate shall be calculated using (i) either the maximum VOC content or the daily volume-weighted VOC content recorded in accordance with paragraph (c) above and (ii) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance);
  - e. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and
  - f. all 3-hour blocks of time during which the average combustion temperature

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within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

4. 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.

#### IV. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
  - a. each period of time when the thermal incinerator's combustion temperature was outside of the acceptable range;
  - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
  - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the combustion temperature into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

2. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the director (the appropriate District Office or local air agency) within 30 days after the event occurs.
3. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the calculated, controlled VOC emission rate exceeds the applicable pounds of VOC per gallon of solids limitation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.
4. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and

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identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

**V. Testing Requirements**

1. Compliance with the emission limitations in section A.I of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation - VOC emissions shall not exceed 0.20 ton per year, including cleanup material.

**Issued: To be entered upon final issuance**

Applicable Compliance Method -

Compliance with the annual limitation shall be based upon the records required pursuant to Section A.III.2 and A.III.3.

The VOC content of the coatings, thinners, other additives, and clean-up materials shall be determined according to OAC rule 3745-21-10(B). USEPA Methods 24 shall be used to determine the VOC contents for coatings. If an owner or operator determines that Method 24 40 CFR Part 60, Appendix A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

b. Emission Limitation -

Particulate emissions shall not exceed 0.551 pound per hour.

Applicable Compliance Method -

To determine compliance with the hourly emission rate for particulates, the following equation shall be used:

$$E = (U) \cdot (D) \cdot (S) \cdot (1 - TE) \cdot (1 - CE)$$

where:

E = particulate matter emission rate (lb/hr)

U = coating usage rate (gal/hr)

D = density of coating (lb/gal)

S = total solids percent by weight of the coating material

TE = transfer efficiency of coating equipment (0.25 for air spray guns)

CE = control efficiency of the control equipment (0.90 for the dry filtration system)

c. Emission Limitation -

Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method -

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A,

Emissions Unit ID: K022

Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

d. Emission Limitation -

The coating(s) applied with this emission unit shall be limited to 6.7 pounds of VOC per gallon of solids.

**Issued: To be entered upon final issuance**

Applicable Compliance Method -

To determine compliance with the pounds of VOC per gallon of solids content for the coating used with this emission unit, the following equation shall be used:

$$E = (1/S) \cdot (V) \cdot (1-CE)$$

where:

E = coating content (lb VOC/gallon of solid)

S = solid content of coating by volume

V = VOC content of coating (lb VOC/gal of coating)

CE = control efficiency of the control equipment (0.95 for the thermal incinerator)

e. Emission Limitation -

The use of a PTE and a thermal incinerator with a minimum control efficiency of 95%.

Applicable Compliance Method -

If required, the following test methods shall be employed to demonstrate compliance with the allowable volatile organic compound emission limitation(s): 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25 or 25A, as appropriate. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

**VI. Miscellaneous Requirements**

None

**Issued: To be entered upon final issuance**

**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (K022) - Small Part Manual Spray Booth (No.3 Adhesive) controlled with a permanent total enclosure (PTE) and thermal incinerator. The terms and conditions of this permit supercede those identified in PTI No. 01-7333 issued on April 11, 1998.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not

**Issued: To be entered upon final issuance**

necessary because the increase in emissions due to the modification(s) to the emissions unit was less than 1 ton per year of each toxic pollutant that has a listed Threshold Limit Value (TLV), as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices").

**Issued: To be entered upon final issuance**

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (K024) - Rotary Adhesive Dipping Machine controlled with a permanent total enclosure (PTE) and thermal incinerator. The terms and conditions of this permit supercede those identified in PTI No. 01-8031 issued on October 6, 1999.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-02(A)	See A.I.2.a below.
OAC rule 3745-21-09(U)(1)(d)	The coatings applied in this emission unit shall be limited to 6.7 pounds of volatile organic compounds (VOC) per gallon of solids.
40 CFR Part 63.3890, MACT Subpart MMMM	See Part II.A.

**2. Additional Terms and Conditions**

- 2.a Permit to install 01-12081 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):
  - i. the permittee shall control VOC emissions from this emissions unit through the use of a permanent total enclosure (PTE) and a thermal incinerator with a minimum overall control efficiency of 95%.
  - ii. the permittee shall limit emissions to 3.4 tons VOC per year.
- 2.b The PTE serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a permanent total enclosure in 40 CFR, Part 51, Appendix M, Reference Method 204, and shall capture all of the VOC emissions

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from this emissions unit. the operation, monitoring, recordkeeping and reporting associated with the PTE shall be conducted in accordance with 40 CFR Part 63, MACT subpart M. M. M. M.

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**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall properly operate and maintain equipment to continuously monitor and record the thermal incinerator's combustion temperature during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the combustion temperature on a continuous basis.

The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance. (Testing conducted on 7/19/06 indicated an average combustion temperature of ~1625°F.)

Whenever the monitored value for the thermal incinerator deviates from the range specified above the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified above, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the combustion temperature readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

2. The permittee shall collect and record the following information each month for this emissions unit:

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- a. the name and identification of each coating and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed;
  - c. the VOC content of each coating and cleanup material, in pounds per gallon;
  - d. the total uncontrolled VOC emissions from all the coatings employed (i.e., the calculated, controlled VOC emission rate times the total volume of all coatings employed in the line), in pounds or tons; and
  - e. the total controlled VOC emissions from all the coatings and cleanup materials employed, in pounds or tons (2.d multiplied by the control efficiency determined during the most recent stack test that demonstrated the emission unit was in compliance).
3. The permittee shall collect and record the following information each month for the coating line and control equipment:
- a. the name and identification number of each coating, as applied;
  - b. the pounds of VOC per gallon of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating;
  - c. the maximum VOC content (in pounds of VOC per gallon of coating solids, as applied) or the daily volume-weighted average VOC content (in pounds of VOC per gallon of coating solids, as applied) of all the coatings;
  - d. the calculated, controlled VOC emission rate, in pounds of VOC per gallon of coating solids, as applied (the controlled VOC emission rate shall be calculated using (i) either the maximum VOC content or the daily volume-weighted VOC content recorded in accordance with paragraph (c) above and (ii) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance);
  - e. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and
  - f. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

#### IV. Reporting Requirements

**Issued: To be entered upon final issuance**

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
  - a. each period of time when the thermal incinerator's combustion temperature was outside of the acceptable range;
  - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
  - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the combustion temperature into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

2. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the director (the appropriate District Office or local air agency) within 30 days after the event occurs.
3. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the calculated, controlled VOC emission rate exceeds the applicable pounds of VOC per gallon of solids limitation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.
4. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

**V. Testing Requirements**

Emissions Unit ID: K024

1. Compliance with the emission limitations in section A.I of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation -  
VOC emissions shall not exceed 3.4 tons per year, including cleanup material.

Applicable Compliance Method -

Compliance with the annual limitation shall be based upon the records required pursuant to Section A.III.2 and A.III.3.

The VOC content of the coatings, thinners, other additives, and clean-up materials shall be determined according to OAC rule 3745-21-10(B). USEPA Methods 24 shall be used to determine the VOC contents for coatings. If an owner or operator determines that Method 24 40 CFR Part 60, Appendix A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

- b. Emission Limitation -  
The coating(s) applied with this emission unit shall be limited to 6.7 pounds of VOC per gallon of solids.

Applicable Compliance Method -

To determine compliance with the pounds of VOC per gallon of solids content for the coating used with this emission unit, the following equation shall be used:

$$E = (1/S) \cdot (V) \cdot (1-CE)$$

where:

E = coating content (lb VOC/gallon of solid)

S = solid content of coating by volume

V = VOC content of coating (lb VOC/gal of coating)

CE = control efficiency of the control equipment (0.95 for the thermal incinerator)

- c. Emission Limitation -  
The use of a PTE and a thermal incinerator with a minimum control efficiency of 95%.

Applicable Compliance Method -

If required, the following test methods shall be employed to demonstrate compliance with the allowable volatile organic compound emission limitation(s): 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25 or 25A, as appropriate. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

Emissions Unit ID: K024

**Issued: To be entered upon final issuance**

**VI. Miscellaneous Requirements**

None

**Issued: To be entered upon final issuance**

**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

***Add rows as necessary***

**Operations, Property, and/or Equipment - (K024) - Rotary Adhesive Dipping Machine controlled with a permanent total enclosure (PTE) and thermal incinerator. The terms and conditions of this permit supercede those identified in PTI No. 01-8031 issued on October 6, 1999.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05	Limit(s)

2. **Additional Terms and Conditions**

- 2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not

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necessary because the increase in emissions due to the modification(s) to the emissions unit was less than 1 ton per year of each toxic pollutant that has a listed Threshold Limit Value (TLV), as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices").

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (K032) - Inner Pipe Brush Adhesive Machine No.1. The terms and conditions of this permit supercede those identified in PTI No. 01-08791 issued on May 11, 2004.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-02(A)	See A.I.2.a below.
OAC rule 3745-21-09(U)(1)(d)	See A.I.2.b below.
40 CFR Part 63.3890, MACT Subpart MMMM	See Part II.A.

**2. Additional Terms and Conditions**

- 2.a Permit to install 01-12081 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):
  - i. the permittee shall limit emissions to 5.8 tons Volatile Organic Compounds (VOC) per year.
- 2.b Pursuant to OAC rule 3745-21-09(U)(2)(e)(iii), this emissions unit is exempt from the emission limitation specified in OAC rule 3745-21-09(U)(1) because the emissions unit never uses more than 10 gallons per day when coating

miscellaneous metal parts.

## II. Operational Restrictions

None

## III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:
  - a. The name and company identification for each coating employed.
  - b. The number of gallons of each coating employed.
  - c. The VOC content of each coating, in pounds per gallon.
  - d. The annual VOC emission rate for all coatings, in tons per year.
2. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:
  - a. The name and company identification for each cleanup material employed.
  - b. The number of gallons of each cleanup material employed, excluding the number of gallons of clean up material recovered.
  - c. The VOC content of each cleanup material, in pounds per gallon.
  - d. The total VOC emission rate for all cleanup materials, in tons per year.
3. The permittee shall collect and record the following information for the purpose of determining daily coating usage
  - a. The name and company identification for each coating employed.
  - b. The number of gallons of coating employed each day.

## IV. Reporting Requirements

1. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.

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2. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

**V. Testing Requirements**

1. Compliance with the emission limitations in section A.I of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation - VOC emissions shall not exceed 5.8 tons per year, including cleanup material.

**Issued: To be entered upon final issuance**

Applicable Compliance Method -

Compliance with the annual limitation shall be based upon the records required pursuant to Section A.III.1 and A.III.2.

The OC content of the coatings, thinners, other additives, and clean-up materials shall be determined according to OAC rule 3745-21-10(B). USEPA Methods 24 shall be used to determine the OC contents for coatings. If an owner or operator determines that Method 24 40 CFR Part 60, Appendix A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

**VI. Miscellaneous Requirements**

None

**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (K032) - Inner Pipe Brush Adhesive Machine No.1.**  
**The terms and conditions of this permit supercede those identified in PTI No. 01-08791 issued on May 11, 2004.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

- 1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the increase in emissions due to the modification(s) to the emissions unit was less than 1 ton per year of each toxic pollutant that has a listed Threshold Limit Value (TLV), as documented in the most current version of the

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**Issued: To be entered upon final issuance**

American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices").

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**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (K033) - Inner Pipe Brush Adhesive Machine No.2. The terms and conditions of this permit supercede those identified in PTI No. 01-08791 issued on May 11, 2004.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-02(A)	See A.I.2.a below.
OAC rule 3745-21-09(U)(1)(d)	See A.I.2.b below.
40 CFR Part 63.3890, MACT Subpart M	See Part II.A.

**2. Additional Terms and Conditions**

- 2.a Permit to install 01-12081 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):
  - i. the permittee shall limit emissions to 5.8 tons Volatile Organic Compounds (VOC) per year.
- 2.b Pursuant to OAC rule 3745-21-09(U)(2)(e)(iii), this emissions unit is exempt from the emission limitation specified in OAC rule 3745-21-09(U)(1) because the emissions unit never uses more than 10 gallons per day when coating miscellaneous metal parts.

**II. Operational Restrictions**

**Issued: To be entered upon final issuance**  
None

Emissions Unit ID: K033

**Issued: To be entered upon final issuance**

**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:
  - a. The name and company identification for each coating employed.
  - b. The number of gallons of each coating employed.
  - c. The VOC content of each coating, in pounds per gallon.
  - d. The annual VOC emission rate for all coatings, in tons per year.
2. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:
  - a. The name and company identification for each cleanup material employed.
  - b. The number of gallons of each cleanup material employed, excluding the number of gallons of clean up material recovered.
  - c. The VOC content of each cleanup material, in pounds per gallon.
  - d. The total VOC emission rate for all cleanup materials, in tons per year.
3. The permittee shall collect and record the following information for the purpose of determining daily coating usage
  - a. The name and company identification for each coating employed.
  - b. The number of gallons of coating employed each day.

**IV. Reporting Requirements**

1. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.
2. The permittee shall also submit annual reports that specify the total VOC emissions

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from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

**Issued: To be entered upon final issuance**

**V. Testing Requirements**

1. Compliance with the emission limitations in section A.I of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation -  
VOC emissions shall not exceed 5.8 tons per year, including cleanup material.

Applicable Compliance Method -

Compliance with the annual limitation shall be based upon the records required pursuant to Section A.III.1 and A.III.2.

The OC content of the coatings, thinners, other additives, and clean-up materials shall be determined according to OAC rule 3745-21-10(B). USEPA Methods 24 shall be used to determine the OC contents for coatings. If an owner or operator determines that Method 24 40 CFR Part 60, Appendix A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

**VI. Miscellaneous Requirements**

None

**Issued: To be entered upon final issuance**

**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (K033) - Inner Pipe Brush Adhesive Machine No.2.**  
**The terms and conditions of this permit supercede those identified in PTI No. 01-08791 issued on May 11, 2004.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the increase in emissions due to the modification(s) to the

**Issued: To be entered upon final issuance**

emissions unit was less than 1 ton per year of each toxic pollutant that has a listed Threshold Limit Value (TLV), as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices").

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (K034) - Inner Pipe Brush Adhesive Machine No.3. The terms and conditions of this permit supercede those identified in PTI No. 01-08791 issued on May 11, 2004.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-02(A)	See A.I.2.a below.
OAC rule 3745-21-09(U)(1)(d)	See A.I.2.b below.
40 CFR Part 63.3890, MACT Subpart M	See Part II.A.

**2. Additional Terms and Conditions**

- 2.a Permit to install 01-12081 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):
  - i. the permittee shall limit emissions to 5.8 tons Volatile Organic Compounds (VOC) per year.
- 2.b Pursuant to OAC rule 3745-21-09(U)(2)(e)(iii), this emissions unit is exempt from the emission limitation specified in OAC rule 3745-21-09(U)(1) because the

Emissions Unit ID: K034

emissions unit never uses more than 10 gallons per day when coating miscellaneous metal parts.

**II. Operational Restrictions**

None

**Issued: To be entered upon final issuance**

**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:
  - a. The name and company identification for each coating employed.
  - b. The number of gallons of each coating employed.
  - c. The VOC content of each coating, in pounds per gallon.
  - d. The annual VOC emission rate for all coatings, in tons per year.
2. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:
  - a. The name and company identification for each cleanup material employed.
  - b. The number of gallons of each cleanup material employed, excluding the number of gallons of clean up material recovered.
  - c. The VOC content of each cleanup material, in pounds per gallon.
  - d. The total VOC emission rate for all cleanup materials, in tons per year.
3. The permittee shall collect and record the following information for the purpose of determining daily coating usage
  - a. The name and company identification for each coating employed.
  - b. The number of gallons of coating employed each day.

**IV. Reporting Requirements**

1. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.
2. The permittee shall also submit annual reports that specify the total VOC emissions

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from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

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**V. Testing Requirements**

1. Compliance with the emission limitations in section A.I of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation -  
VOC emissions shall not exceed 5.8 tons per year, including cleanup material.

Applicable Compliance Method -

Compliance with the annual limitation shall be based upon the records required pursuant to Section A.III.1 and A.III.2.

The OC content of the coatings, thinners, other additives, and clean-up materials shall be determined according to OAC rule 3745-21-10(B). USEPA Methods 24 shall be used to determine the OC contents for coatings. If an owner or operator determines that Method 24 40 CFR Part 60, Appendix A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

**VI. Miscellaneous Requirements**

None

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**B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (K034) - Inner Pipe Brush Adhesive Machine No.3.**  
**The terms and conditions of this permit supercede those identified in PTI No. 01-08791 issued on May 11, 2004.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

**2. Additional Terms and Conditions**

- 2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the increase in emissions due to the modification(s) to the emissions unit was less than 1 ton per year of each toxic pollutant that has a listed Threshold Limit Value (TLV), as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and

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Physical Agents, Biological Exposure Indices").

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (K035) - Inner Pipe Brush Adhesive Machine No.4. The terms and conditions of this permit supercede those identified in PTI No. 01-08791 issued on May 11, 2004.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-02(A)	See A.I.2.a below.
OAC rule 3745-21-09(U)(1)(d)	See A.I.2.b below.
40 CFR Part 63.3890, MACT Subpart MMMM	See Part II.A.

**2. Additional Terms and Conditions**

- 2.a Permit to install 01-12081 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):
  - i. the permittee shall limit emissions to 5.8 tons Volatile Organic Compounds (VOC) per year.
- 2.b Pursuant to OAC rule 3745-21-09(U)(2)(e)(iii), this emissions unit is exempt from the emission limitation specified in OAC rule 3745-21-09(U)(1) because the emissions unit never uses more than 10 gallons per day when coating miscellaneous metal parts.

**II. Operational Restrictions**

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None

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**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:
  - a. The name and company identification for each coating employed.
  - b. The number of gallons of each coating employed.
  - c. The VOC content of each coating, in pounds per gallon.
  - d. The annual VOC emission rate for all coatings, in tons per year.
2. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:
  - a. The name and company identification for each cleanup material employed.
  - b. The number of gallons of each cleanup material employed, excluding the number of gallons of clean up material recovered.
  - c. The VOC content of each cleanup material, in pounds per gallon.
  - d. The total VOC emission rate for all cleanup materials, in tons per year.
3. The permittee shall collect and record the following information for the purpose of determining daily coating usage
  - a. The name and company identification for each coating employed.
  - b. The number of gallons of coating employed each day.

**IV. Reporting Requirements**

1. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the coating line employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.
2. The permittee shall also submit annual reports that specify the total VOC emissions

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from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

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**V. Testing Requirements**

1. Compliance with the emission limitations in section A.I of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation -  
VOC emissions shall not exceed 5.8 tons per year, including cleanup material.

Applicable Compliance Method -

Compliance with the annual limitation shall be based upon the records required pursuant to Section A.III.1 and A.III.2.

The OC content of the coatings, thinners, other additives, and clean-up materials shall be determined according to OAC rule 3745-21-10(B). USEPA Methods 24 shall be used to determine the OC contents for coatings. If an owner or operator determines that Method 24 40 CFR Part 60, Appendix A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

**VI. Miscellaneous Requirements**

None

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**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (K035) - Inner Pipe Brush Adhesive Machine No.4. The terms and conditions of this permit supercede those identified in PTI No. 01-08791 issued on May 11, 2004.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the increase in emissions due to the modification(s) to the

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emissions unit was less than 1 ton per year of each toxic pollutant that has a listed Threshold Limit Value (TLV), as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices").

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (K053) - Indexed Table Adhesive Spray Booth No.1.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-02(A)	See A.I.2.a below.
OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 0.551 pound per hour. See A.I.2.c below.
OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
OAC rule 3745-21-09(U)(1)(d)	The coating(s) applied in this emission unit shall be limited to 6.7 pounds of volatile organic compounds (VOC) per gallon of solids.
40 CFR Part 63.3890, MACT Subpart M	See Part II.A.

**2. Additional Terms and Conditions**

- 2.a Permit to install 01-12081 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):
  - i. the permittee shall control VOC emissions from this emissions unit through the use of a permanent total enclosure (PTE) and a thermal incinerator with a minimum overall control efficiency of 95%.

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- ii. the permittee shall limit emissions to 5.5 tons Volatile Organic Compounds (VOC) per year.
- 2.b** The PTE serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a permanent total enclosure in 40 CFR, Part 51, Appendix M, Reference Method 204, and shall capture all of the VOC emissions from this emissions unit.
- 2.c** The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

## II. Operational Restrictions

None

## III. Monitoring and/or Recordkeeping Requirements

- 1.** The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the thermal incinerator's combustion temperature during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the combustion temperature on a continuous basis.

The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature maintained during the most recent emissions test that demonstrated the emissions unit to be in compliance.

Whenever the monitored value for the thermal incinerator deviates from the range specified above the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified above, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the combustion temperature readings immediately after the corrective action, and the names of the

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

2. The permittee shall collect and record the following information each month for this emissions unit:
  - a. the name and identification of each coating and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed;
  - c. the VOC content of each coating and cleanup material, in pounds per gallon;
  - d. the total uncontrolled VOC emissions from all the coatings employed (i.e., the calculated, controlled VOC emission rate times the total volume of all coatings employed in the line), in pounds or tons; and
  - e. the total controlled VOC emissions from all the coatings and cleanup materials employed, in pounds or tons (2.d multiplied by the control efficiency determined during the most recent stack test that demonstrated the emission unit was in compliance).
  
3. The permittee shall collect and record the following information each month for the coating line and control equipment:
  - a. the name and identification number of each coating, as applied;
  - b. the pounds of VOC per gallon of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating;
  - c. the maximum VOC content (in pounds of VOC per gallon of coating solids, as applied) or the daily volume-weighted average VOC content (in pounds of VOC per gallon of coating solids, as applied) of all the coatings;
  - d. the calculated, controlled VOC emission rate, in pounds of VOC per gallon of coating solids, as applied (the controlled VOC emission rate shall be calculated using (i) either the maximum VOC content or the daily volume-weighted VOC content recorded in accordance with paragraph (c) above and (ii) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance);

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- e. a log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit; and
  - f. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.
4. The permittee shall install, maintain, and operate monitoring devices and a recorder which continuously and simultaneously measure and record the pressure inside and outside the permanent total enclosure surrounding K053. The monitoring and recording devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

The permittee shall continuously record the pressure differential between the inside and outside of the permanent total enclosure, when the emissions unit is in operation.

The PTE shall be maintained under negative pressure, at a minimum differential pressure that is not less than 0.007 inches of water, as averaged on an hourly basis, whenever the emissions unit is in operation.

#### IV. Reporting Requirements

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
  - a. each period of time when the thermal incinerator's combustion temperature was outside of the acceptable range;
  - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
  - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the combustion temperature into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

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2. The permittee shall submit quarterly deviation (excursion) reports which identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure of 0.007 inches of water (200 fpm), as per U.S. EPA Test Method 204, when the emissions unit was in operation.
3. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the director (the appropriate District Office or local air agency) within 30 days after the event occurs.
4. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the calculated, controlled VOC emission rate exceeds the applicable pounds of VOC per gallon of solids limitation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.
5. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

## V. Testing Requirements

1. Compliance with the emission limitations in section A.I of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation -  
VOC emissions shall not exceed 5.5 tons per year, including cleanup material.

Applicable Compliance Method -  
Compliance with the annual limitation shall be based upon the records required pursuant to Section A.III.2 and A.III.3.

The VOC content of the coatings, thinners, other additives, and clean-up materials shall be determined according to OAC rule 3745-21-10(B). USEPA Methods 24 shall be used to determine the VOC contents for coatings. If an owner or operator determines that Method 24 40 CFR Part 60, Appendix A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

- b. Emission Limitation -  
Particulate emissions shall not exceed 0.551 pound per hour.

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Applicable Compliance Method -

To determine compliance with the hourly emission rate for particulates, the following equation shall be used:

$$E = (U) \cdot (D) \cdot (S) \cdot (1 - TE) \cdot (1 - CE)$$

where:

E = particulate matter emission rate (lb/hr)

U = coating usage rate (gal/hr)

D = density of coating (lb/gal)

S = total solids percent by weight of the coating material

TE = transfer efficiency of coating equipment (0.25 for air spray guns)

CE = control efficiency of the control equipment (0.90 for the dry filtration system)

c. Emission Limitation -

Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

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Applicable Compliance Method -

If required, compliance shall be determined through visible emission 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).

d. Emission Limitation -

The coating(s) applied with this emission unit shall be limited to 6.7 pounds of VOC per gallon of solids.

Applicable Compliance Method -

To determine compliance with the pounds of VOC per gallon of solids content for the coating used with this emission unit, the following equation shall be used:

$$E = (1/S) \cdot (V) \cdot (1 - CE)$$

where:

E = coating content (lb VOC/gallon of solid)

S = solid content of coating by volume

V = VOC content of coating (lb VOC/gal of coating)

CE = control efficiency of the control equipment (0.95 for the thermal incinerator)

Compliance may be based on the records required in Section A.III.3 above.

e. Emission Limitation -

Use of a PTE and thermal incinerator with a minimum destruction and control efficiency of 95%.

Applicable Compliance Method -

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

- i. The emission testing shall be conducted within 6 months following startup of emissions unit K053.
- ii. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for VOCs.
- iii. The following test method(s) shall be employed to demonstrate

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compliance with the allowable mass emission rate(s):

40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25 or 25A, as appropriate. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- iv. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
- v. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- vi. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- vii. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- viii. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

## VI. Miscellaneous Requirements

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None

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**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (K053) - Indexed Table Adhesive Spray Booth No.1.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

2. **Additional Terms and Conditions**

- 2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic pollutant will be less than 1.0 ton. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit to install prior to making a "modification" as

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defined by OAC rule 3745-31-01. The permittee is hereby advised that a new permit to install application would be required for an emissions unit if changes in the composition of the materials or use of new materials would cause the emissions of any pollutant that has a listed Threshold Limit Value (TLV), as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices"), to increase to above 1.0 ton per year.