



State of Ohio Environmental Protection Agency

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

**CERTIFIED MAIL**

Street Address:

50 West Town Street, Suite 700

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

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 01-12190**

**Fac ID: 0124010098**

**DATE: 1/8/2008**

Yusa Corporation  
Sue Ahrmann  
151 Jamison Rd SW  
Washington Court House, OH 43160

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

Sincerely,

*Michael W. Ahern*

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

CC: USEPA

CDO



---

**Permit To Install  
Terms and Conditions**

**Issue Date: 1/8/2008  
Effective Date: 1/8/2008**

---

**FINAL PERMIT TO INSTALL 01-12190**

Application Number: 01-12190  
Facility ID: 0124010098  
Permit Fee: **\$400**  
Name of Facility: Yusa Corporation  
Person to Contact: Sue Ahrmann  
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):  
**Manual spray booth and rotary adhesive dipping machine.**

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

---

Chris Korleski  
Director

## 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 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 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.

**Yusa Corporation**  
**PTI Application: 01-12190**  
**Issued: 1/8/2008**

**Facility ID: 0124010098**

## **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.

- 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.

**Yusa Corporation**  
**PTI Application: 01-12190**  
**Issued: 1/8/2008**

**Facility ID: 0124010098**

**12. Air Pollution Nuisance**

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

**Yusa Corporation**  
**PTI Application: 01-12190**  
**Issued: 1/8/2008**

**Facility ID: 0124010098**

### **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.

**Yusa Corporation**  
**PTI Application: 01-12190**  
**Issued: 1/8/2008**

**Facility ID: 0124010098**

The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**Yusa Corporation**  
**PTI Application: 01-12190**  
**Issued: 1/8/2008**

**Facility ID: 0124010098**

**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**

**Yusa Corporation**  
**PTI Application: 01-12190**  
**Issued: 1/8/2008**

**Facility ID: 0124010098**

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.

**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 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	10.26

**Yusa Corporation**  
**PTI Application: 01-12190**  
**Issued: 1/8/2008**

**Facility ID: 0124010098**

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

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

1. The following emissions units contained in this permit are subject to MACT Subpart MMMM: K002 and K024. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting OEPA Central District Office (CDO), Division of Air Pollution Control (DAPC).

**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 spray booth (upstairs). Application of primer and adhesive with three electric ovens and controlled with a permanent total enclosure (PTE) and thermal incinerator. The terms and conditions of this permit supercede those identified in PTI No. 01-12081 issued on January 7, 2007.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C)	See A.I.2.a below.
OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 0.551 pound per hour. See A.I.2.b and A.I.2.c below.
OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
OAC rule 3745-21-09(U)(1)(i)	The coating(s) applied in this emission unit shall be limited to 5.1 pounds of volatile organic compounds (VOC) per gallon of coating solids.
40 CFR Part 63, MACT Subpart MMMM	See A.I.2.d and A.I.2.e below.
40 CFR Part 63, Subpart A (40 CFR Part 63.1-16)	See A.I.2.f below.

**2. Additional Terms and Conditions**

- 2.a Permit to install 01-12190 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 5.61 tons VOC per year, including cleanup material.

Emissions Unit ID: K002

- 2.b** The hourly PE limitation for this emissions unit is greater than the potential to emit as vented to dry filtration. Therefore it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.
- 2.c** The permittee shall operate the dry filtration system whenever this emissions unit is in operation.
- 2.d** 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.e** The following emissions limitations apply to all rubber-to-metal coating operations at the facility:
- i. Organic hazardous air pollutant (HAP) emissions shall not exceed 37.7 pounds of HAPs per gallon of coating solids during each 12-month compliance period.
- 2.f** Table 2 to subpart M of 40 CFR Part 63 - "Applicability of General Provisions (Subpart A) to Subpart M of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.

## II. Operational Restrictions

1. Applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart M (40 CFR part 63.3880-3981).

## 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 1840°F.)

Emissions Unit ID: K002

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:
  - 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;

**Issued: 1/8/2008**

- 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 by multiplying (i) the maximum VOC content or the daily volume-weighted VOC content recorded in accordance with paragraph (c) above by (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.
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.
  5. The permittee shall maintain daily records that document any time periods when wet parts and/or parts-racks are exiting the PTE serving this emissions unit.
  6. Applicable monitoring and record keeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart M (40 CFR part 63.3880-3981).

#### **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;

Emissions Unit ID: K002

- 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 Ohio EPA, Central District Office 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 notify the Ohio EPA, Central District Office in writing of any daily record showing that wet parts and/or parts-racks were exiting the PTE serving this emissions unit. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 30 days after the event 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.
6. Applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart M (40 CFR part 63.3880-3981).

## 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. Emissions Limitation -  
VOC emissions shall not exceed 5.61 tons per year, including cleanup material.

Applicable Compliance Method -

Issued: 1/8/2008

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. Emissions 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. Emissions 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: K002

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

- d. Emissions Limitation -  
The coating(s) applied with this emission unit shall be limited to 5.1 pounds of VOC per gallon of coating 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 or the control efficiency determined during the most recent stack test that demonstrated the emission unit was in compliance)

- e. Emissions 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.

- f. Emissions Limitation -  
Organic hazardous air pollutant (HAP) emissions shall not exceed 37.7 pounds of HAPs per gallon of coating solids during each 12-month compliance period.

Applicable Compliance Method -

Applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart M (40 CFR part 63.3880-3981).

## VI. Miscellaneous Requirements

- The terms and conditions in this permit supercede those identified in PTI 01-12081 issued January 7, 2007.

Issued: 1/8/2008

**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 spray booth (upstairs). Application of primer and adhesive with three electric ovens and controlled with a permanent total enclosure (PTE) and thermal incinerator. The terms and conditions of this permit supercede those identified in PTI No. 01-12081 issued on January 7, 2007.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Air Toxics Policy	See section B.III below.

2. **Additional Terms and Conditions**

- 2.a None

**II. Operational Restrictions**

None

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

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because this emissions unit is subject to a federal rule, 40 CFR, Part 63, Subpart M. M. M. M.

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

**Issued: 1/8/2008**

Emissions Unit ID: K002

None

Issued: 1/8/2008

**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. 01-12081 issued on January 7, 2007.**

<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
OAC rule 3745-31-05(C)	See A.I.2.a below.
OAC rule 3745-21-09(U)(1)(i)	The coatings applied in this emission unit shall be limited to 5.1 pounds of volatile organic compounds (VOC) per gallon of coating solids.
40 CFR Part 63.3890, MACT Subpart MMMM	See A.I.2.b and A.I.2.c below.
40 CFR Part 63, Subpart A (40 CFR Part 63.1-16)	See A.I.2.d below.

**2. Additional Terms and Conditions**

- 2.a Permit to install 01-12190 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 4.65 tons VOC per year.

Emissions Unit ID: K024

- 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 MMMM.
- 2.c** The following emissions limitations apply to all rubber-to-metal coating operations at the facility:
- i. Organic hazardous air pollutant (HAP) emissions shall not exceed 37.7 pounds of HAPs per gallon of coating solids during each 12-month compliance period.
- 2.d** Table 2 to subpart MMMM of 40 CFR Part 63 - "Applicability of General Provisions (Subpart A) to Subpart MMMM of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.

## II. Operational Restrictions

1. Applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart MMMM (40 CFR part 63.3880-3981).

## 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 1840°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.

Emissions Unit ID: K024

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:
  - 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 by multiplying (i) the maximum VOC content or the daily volume-weighted

**Issued: 1/8/2008**

VOC content recorded in accordance with paragraph (c) above by (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.
4. Applicable monitoring and record keeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart M (40 CFR part 63.3880-3981).

#### **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

**Yusa Corporation**

DTI Application: 01-12100

**Facility ID: 0124010098**

Emissions Unit ID: K024

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.
4. Applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart M (40 CFR part 63.3880-3981).

Issued: 1/8/2008

## 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. Emissions Limitation -  
VOC emissions shall not exceed 4.65 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. Emissions Limitation -  
The coating(s) applied with this emission unit shall be limited to 5.1 pounds of VOC per gallon of coating 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. Emissions Limitation -  
The use of a PTE and a thermal incinerator with a minimum control efficiency of

Issued: 1/8/2008

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.

d. Emissions Limitation -

Organic hazardous air pollutant (HAP) emissions shall not exceed 37.7 pounds of HAPs per gallon of coating solids during each 12-month compliance period.

Applicable Compliance Method -

Applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart M (40 CFR part 63.3880-3981).

**VI. Miscellaneous Requirements**

1. The terms and conditions in this permit supercede those identified in PTI 01-12081 issued January 7, 2007.

Issued: 1/8/2008

**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 -(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. 01-12081 issued on January 7, 2007.**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Air Toxics Policy	See section B.III below.

2. **Additional Terms and Conditions**

- 2.a None

**II. Operational Restrictions**

None

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

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because this emissions unit is subject to a federal rule, 40 CFR, Part 63, Subpart Mmmm.

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

31

**Yusa Corporation**

**DTI Application: 01 12100**

**Facility ID: 0124010098**

Emissions Unit ID: K024

None