



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL  
FRANKLIN 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: 01-12182**

**Fac ID: 0125031840**

**DATE: 2/21/2008**

TS Trim Industries  
Andrew Shroads  
4150 Tuller Road Suite 212  
Dublin, OH 43017

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, Manager  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

CC: USEPA

CDO



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**Permit To Install  
Terms and Conditions**

**Issue Date: 2/21/2008  
Effective Date: 2/21/2008**

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**FINAL PERMIT TO INSTALL 01-12182**

Application Number: 01-12182  
Facility ID: 0125031840  
Permit Fee: **\$800**  
Name of Facility: TS Trim Industries  
Person to Contact: Andrew Shroads  
Address: 4150 Tuller Road Suite 212  
Dublin, OH 43017

Location of proposed air contaminant source(s) [emissions unit(s)]:

**59 Gender Road  
Canal Winchester, Ohio**

Description of proposed emissions unit(s):

**Adhesive coating operation.**

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

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Chris Korleski  
Director

## Part I - GENERAL TERMS AND CONDITIONS

### A. Permit to Install General Terms and Conditions

#### 1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install 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 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 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. Records Retention Requirements

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.

#### 4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon

**TS Trim Industries**  
**PTI Application: 01-12182**  
**Issued: 2/21/2008**

**Facility ID: 0125031840**

the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction 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. 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 emissions unit(s) that is (are) served by such control system(s).

**6. 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.

**7. 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.

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install 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.

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

**TS Trim Industries**  
**PTI Application: 01-12182**  
**Issued: 2/21/2008**

**Facility ID: 0125031840**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. 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 the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install 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.

#### **10. 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.

#### **11. Applicability**

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

#### **12. 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.

TS Trim Industries  
 PTI Application: 01-12182  
 Issued: 2/21/2008

Facility ID: 0125031840

**13. Source Operation and Operating Permit Requirements After Completion of Construction**

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This 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 emissions unit(s) covered by this permit.

**14. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) 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.

**15. 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 this Permit to Install.

**B. 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>
Facility-wide individual HAP	9.9
Facility-wide VOC	17.7

Emissions Unit ID: R019

## PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

### A. 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 -(R019) - Vacuum Form adhesive coating line w/4 booths and infrared ovens (modification of PTI 01-06663)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The volatile organic compound (VOC) emissions from emissions units R019, R020, R021 and R029 shall not exceed 6.8 lbs/hr.  See sections A.2.a, A.2.b, B.1, B.2, B.3 and E.1 below.
OAC rule 3745-21-07(G)(2)	None. See section A.2.c below.
OAC rule 3745-31-05(C) (synthetic minor to avoid Title V and MACT requirements)	See section A.2.d and B.1 below.

### 2. Additional Terms and Conditions

- 2.a The emissions of VOC from emissions units R019, R020, and R021 shall not exceed 16.1 tons per year, including cleanup, based upon a rolling, 12-month summation of the monthly emissions.
- 2.b The VOC emissions shall be vented to the control system (concentrator and thermal oxidizer) which shall maintain an overall reduction in VOC of 90%, by weight. In order to achieve this reduction, the permittee shall maintain a permanent total enclosure (PTE) for capturing all the VOC emissions from this emissions unit.
- 2.c The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d Facility-wide emissions shall not exceed 9.9 tons of individual hazardous air pollutant (HAP) and 17.7 tons of total VOC emissions based on a rolling, 12-month summation of monthly emissions.

**Issued: 2/21/2008**

Facility-wide emissions shall be determined from a summation of monthly emissions from R019, R020, R021 and R029 and all emissions units that are exempted under permit by rule (OAC rule 3745-31-03) and/or a de minimis (OAC rule 3745-15-05) exemption.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact.

## **B. Operational Restrictions**

1. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12 month summation of the coating usage, upon issuance of this permit. The maximum annual coating usage for emissions units R019, R020, and R021 shall not exceed 51,000 gallons adhesive and 660 gallons clean-up solvent, based upon a rolling, 12 month summation of the monthly usages.
2. The permanent total enclosure (PTE) serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a permanent total enclosure in Method 204 (40 CFR Part 51, Appendix M) whenever the emissions unit is in operation. The PTE shall be maintained under negative pressure at a minimum differential pressure of not less than 0.004 inch of water during any rolling, 15-minute period, based on the average of the 1-minute values.
3. The non-methane organic compound (NMOC) concentration of the exhaust gases from the concentrator shall not exceed 20 ppm, when the emissions unit is in operation.
4. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time, whenever the emissions unit is in operation, shall not be more than 50 degrees below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

## **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain and operate monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the PTE. The monitoring and recording devices shall be calibrated, operated and maintained in accordance with the procedures specified below.

The differential pressure monitor and recorder will serve as instrumentation for

Emissions Unit ID: **R019**

ensuring the integrity of the PTE. The instrumentation shall be maintained in accordance with the most recent Quality Assurance/Quality Control (QA/QC) Plan. In accordance with the QA/QC plan, the differential pressure gauge shall be calibrated to ensure the electrical integrity of the transmitter output for the purpose of span adjustments and shall be calibrated by the manufacturer during facility shutdowns.

2. The permittee shall operate and maintain continuous monitoring device and recorder(s) which measure and record the NMOC emissions in parts per million (ppm) from the concentrator in accordance with the procedures specified in the most recent Quality Assurance/Quality Control (QA/QC) Plan. In accordance with the QA/QC plan, the primary NMOC monitor shall be calibrated with a certified span gas at nominal concentration of 10 ppm isobutylene
3. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
4. The permittee shall collect and record the following information for each day:
  - a. the difference in pressure between the PTE and the surrounding area(s), in inches of water, for each rolling, 15-minute period, as measured once per minute;
  - b. the NMOC concentrations of the exhaust gases from the concentrator, in ppm, as measured once per minute; and
  - c. 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 below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance, as measured once per minute; and
  - d. a log or record of downtime for the capture (collection) system, control device(s), and monitoring equipment when the associated emissions unit was in operation.
5. The permittee shall maintain monthly records of the following information:

**Issued: 2/21/2008**

- a. the company identification of each coating and cleanup material employed in emissions units R019, R020, R021 and R029;
  - b. the VOC content, in pounds per gallon, of each coating and cleanup material, as employed;
  - c. the number of gallons of each coating and cleanup material employed in each of emissions units R019, R020 and R021;
  - d. the total number of gallons of all coatings and the total number of gallons of all cleanup materials employed in each of emissions units R019, R020 and R021;
  - e. the total uncontrolled VOC emission rate for all coatings and cleanup materials including those from R029, in pounds per month (i.e., the summation of (Section C.5.b) x (Section C.5.c), for each coating and cleanup material);
  - f. the total controlled VOC emission rate for all coatings and cleanup materials, in pounds per month (i.e., the value from Section C.5.e., above) multiplied by the overall control efficiency from the most recent emission test that demonstrated the emission unit was in compliance;
  - g. the total controlled rolling, 12-month VOC emission rate for all coatings and cleanup materials, in tons per year, calculated by summing the monthly values from Section C.5.f for the current month and previous 11 months and dividing by 2000 pounds per ton;
  - h. the results of the monthly differential pressure monitor electrical integrity tests (transmitter output) and record of the correlation calculations, including the time and date of the test, the differential pressure monitor readout during testing, and if the readout is not within specification values, a description of the problem and corrective actions taken to correct this problem; and
  - i. a summation of the results of the weekly manual calibrations of the primary NMOC monitor, including the time and date of calibration, the certified calibration gas concentration, the primary NMOC monitor concentration readout during calibration, and if the readout is not within +/- 10% of the calibration gas value, a description of the problem and corrective actions taken to correct this problem.
6. The permittee shall collect and record the following information during each month for

Emissions Unit ID: **R019**

the purpose of determining annual VOC and HAP emissions from emissions units R019, R020, R021 and R029 and all exempt and/or de minimus emissions units:

- a. the monthly VOC and HAP emission rate for all coatings and cleanup materials, in pounds from each of the above emissions units;
  - b. the rolling, 12-month summation of VOC emissions (i.e., the VOC emissions from the current month added to the summation of the VOC emissions from the previous 11 months) for all of the above emissions units;
  - c. the calculated individual HAP emission for the current month, in pounds or tons, for each of the above emissions units;
  - d. the calculated total HAP emissions for the current month, in pounds or tons, for each the above emissions units; and
  - e. the rolling 12-month summation of individual HAP emissions (i.e., the individual HAP emissions from the current month added to the summation of the individual HAP emissions from the previous 11 months) for all the above emissions units.
7. 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.
8. The permit to install for emissions unit R019, R020, R021 and R029 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (mg/m<sup>3</sup>): 188.4 mg/m<sup>3</sup>

Maximum Hourly Emission Rate (lbs/hr): 3.86 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 65.91

MAGLC (ug/m<sup>3</sup>): 4,486 ug/m<sup>3</sup>

**Issued: 2/21/2008**

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, 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");
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new

Emissions Unit ID: R019

pollutants emitted, change in stack/exhaust parameters, etc.);

- b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### D. Reporting Requirements

1. In accordance with paragraph A.1.c of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. all periods of time, when the emissions unit was in operation, during which the differential pressure of the PTE was not maintained at or above 0.004 inch water during any rolling, 15-minute period, based on the average of the 1-minute values recorded by the data logger;
  - b. all periods of time, when the emissions unit was in operation, during which the NMOC concentration from the exhaust of the carbon bed concentrator was in excess of 20 ppm;
  - c. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified above; and
  - d. any continuous monitoring system downtime while the emissions unit was in operation, including documentation of date, time, duration and reason, along with any corrective action taken.
2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC and individual HAPs and any exceedances of the of the rolling, 12-month coating usage limitation. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
3. The permittee shall submit annual reports that specify the total VOC emissions from emissions units R019, R020, R021 and R029 for the previous calendar year. These reports shall be submitted by January 31 of each year.

Issued: 2/21/2008

**E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I.1 of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation:

The VOC emissions shall be vented to the control system (concentrator and the thermal incinerator) which shall maintain an overall reduction of 90%, by weight.

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 permit issuance.
- ii. The emission testing shall be conducted to demonstrate compliance with the 90% overall control efficiency requirement. (The permittee has previously demonstrated that the PTE satisfies the criteria specified in Method 204 of 40 CFR Part 51, Appendix M.)
- iii. The control efficiency (i.e., the percent reduction in mass emissions between the inlet to the concentrator and the combined outlets of the thermal and concentrator) shall be determined in accordance with Method 25A of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- iv. The test(s) shall be conducted while emissions units R019, R020, R021 and R029 are operating at or near their maximum capacities, unless otherwise specified or approved by the Ohio EPA, Central District Office.
- v. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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

Emissions Unit ID: R019

emission test(s).

- vi. Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test, 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.
  - vii. 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.
- b. Emission Limitation:  
The volatile organic compound (VOC) emissions from emissions units R019, R020, R021 and R029 shall not exceed 6.8 lbs/hr.
- Applicable Compliance Method:  
Compliance with this emission limitation shall be demonstrated based upon the emissions testing required in Section E.1.a above.
- c. Emissions Limitation:  
The maximum annual coating usage for emissions units R019, R020, and R021 shall not exceed 51,000 gallons adhesive and 660 gallons clean-up solvent, based upon a rolling, 12 month summation of the monthly usages.
- Applicable Compliance Method:  
Compliance with the annual usage restrictions shall be determined by summing the monthly usages for the calendar year, i.e., the value calculated in section C.5.c, above.
- d. Emissions Limitation:  
The emissions of VOC from emissions units R019, R020, and R021 shall not exceed 16.1 tons per year, including cleanup, based upon a rolling, 12-month summation of the monthly emissions.

**Issued: 2/21/2008**

Applicable Compliance Method:

Compliance with the annual emissions limitation shall be determined by summing the monthly emissions, i.e., the value calculated in section C.5.g above.

- e. Emission Limitation:  
The total facility-wide emission rate from R019, R020, R021 and R029 shall not exceed 17.7 tons VOC/yr, including cleanup emissions.

Applicable Compliance Method:

Compliance with the controlled annual VOC emission limitation shall be demonstrated based upon the record keeping requirements contained in Section C.6. of this permit. The overall control efficiency shall be demonstrated by emission testing conducted in accordance with Section C.6.b of this permit.

- f. Emission Limitation  
Facility-wide emissions shall not exceed 9.9 of an individual HAP per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method

Compliance shall be demonstrated by record keeping in section C.6.e, above.

Formulation data or USEPA Method 24 shall be used to determine the VOC content of the adhesives and cleanup materials.

## **F. Miscellaneous Requirements**

None

Emissions Unit ID: R020

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. 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 -(R020) - SEP Front Assembly coating line w/2 booths and 1 infrared oven (modification of PTI 01-06663)**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The volatile organic compound (VOC) emissions from emissions units R019, R020, R021 and R029 shall not exceed 6.8 lbs/hr.  See sections A.2.a, A.2.b, B.1, B.2 and B.3 and E.1 below.
OAC rule 3745-21-07(G)(2)	None. See section A.2.c below.
OAC rule 3745-31-05(C) (synthetic minor to avoid Title V and MACT requirements)	See section A.2.d and B.1 below.

**2. Additional Terms and Conditions**

- 2.a The emissions of VOC from emissions units R019, R020, and R021 shall not exceed 16.1 tons per year, including cleanup, based upon a rolling, 12-month summation of the monthly emissions
- 2.b The VOC emissions shall be vented to the control system (concentrator and the thermal oxidizer ) which shall maintain an overall reduction of 90%, by weight. In order to achieve this reduction, the permittee shall maintain a permanent total enclosure for capturing all the VOC emissions from this emissions unit.
- 2.c The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d Facility-wide emissions shall not exceed 9.9 tons of individual hazardous air pollutant (HAP) and 17.7 tons of total VOC emissions based on a rolling, 12-month summation of monthly emissions.

**Issued: 2/21/2008**

Facility-wide emissions shall be determined from a summation of monthly emissions from R019, R020, R021 and R029 and all emissions units that are exempted under permit by rule (OAC rule 3745-31-03) and/or a de minimis (OAC rule 3745-15-05) exemption.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact.

## **B. Operational Restrictions**

1. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12 month summation of the coating usage, upon issuance of this permit. The maximum annual coating usage for emissions units R019, R020, and R021 shall not exceed 51,000 gallons adhesive and 660 gallons clean-up solvent, based upon a rolling, 12 month summation of the monthly usages.
2. The permanent total enclosure (PTE) serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a permanent total enclosure in Method 204 (40 CFR Part 51, Appendix M) whenever the emissions unit is in operation. The PTE shall be maintained under negative pressure at a minimum differential pressure of not less than 0.004 inch of water during any rolling, 15-minute period, based on the average of the 1-minute values.
3. The non-methane organic compound (NMOC) concentration of the exhaust gases from the concentrator shall not exceed 20 ppm, when the emissions unit is in operation.
4. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time, whenever the emissions unit is in operation, shall not be more than 50 degrees below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

## **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain and operate monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the PTE. The monitoring and recording devices shall be calibrated, operated and maintained in accordance with the procedures specified below.

The differential pressure monitor and recorder will serve as instrumentation for ensuring

Emissions Unit ID: **R020**

the integrity of the PTE. The instrumentation shall be maintained in accordance with the most recent Quality Assurance/Quality Control (QA/QC) Plan. In accordance with the QA/QC plan, the differential pressure gauge shall be calibrated to ensure the electrical integrity of the transmitter output for the purpose of span adjustments and shall be calibrated by the manufacturer during facility shutdowns.

2. The permittee shall operate and maintain continuous monitoring device and recorder(s) which measure and record the NMOC emissions in parts per million (ppm) from the concentrator in accordance with the procedures specified in the most recent Quality Assurance/Quality Control (QA/QC) Plan. In accordance with the QA/QC plan, the primary NMOC monitor shall be calibrated with a certified span gas at nominal concentration of 10 ppm isobutylene.
3. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
4. The permittee shall collect and record the following information for each day:
  - a. The permittee shall collect and record the following information for each day:
  - b. the difference in pressure between the PTE and the surrounding area(s), in inches of water, for each rolling, 15-minute period, as measured once per minute;
  - c. the NMOC concentrations of the exhaust gases from the concentrator, in ppm, as measured once per minute; and
  - d. 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 below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance, as measured once per minute; and
  - e. a log or record of downtime for the capture (collection) system, control device(s), and monitoring equipment when the associated emissions unit was in operation.

**Issued: 2/21/2008**

5. The permittee shall maintain monthly records of the following information:
  - a. the company identification of each coating and cleanup material employed in emissions units R019, R020, R021 and R029;
  - b. the VOC content, in pounds per gallon, of each coating and cleanup material, as employed;
  - c. the number of gallons of each coating and cleanup material employed in each of emissions units R019, R020 and R021;
  - d. the total number of gallons of all coatings and the total number of gallons of all cleanup materials employed in each of emissions units R019, R020 and R021;
  - e. the total uncontrolled VOC emission rate for all coatings and cleanup materials including those from R029, in pounds per month (i.e., the summation of (Section C.5.b) x (Section C.5.c), for each coating and cleanup material);
  - f. the total controlled VOC emission rate for all coatings and cleanup materials, in pounds per month (i.e., the value from Section C.5.e., above) multiplied by the overall control efficiency from the most recent emission test that demonstrated the emission unit was in compliance;
  - g. the total controlled rolling, 12-month VOC emission rate for all coatings and cleanup materials, in tons per year, calculated by summing the monthly values from Section C.5.f for the current month and previous 11 months and dividing by 2000 pounds per ton;
  - h. the results of the monthly differential pressure monitor electrical integrity tests (transmitter output) and record of the correlation calculations, including the time and date of the test, the differential pressure monitor readout during testing, and if the readout is not within specification values, a description of the problem and corrective actions taken to correct this problem; and
  - i. a summation of the results of the weekly manual calibrations of the primary NMOC monitor, including the time and date of calibration, the certified calibration gas concentration, the primary NMOC monitor concentration readout during calibration, and if the readout is not within +/- 10% of the calibration gas value, a description of the problem and corrective actions taken to correct this problem.

Emissions Unit ID: R020

6. The permittee shall collect and record the following information during each month for the purpose of determining annual VOC and HAP emissions from emissions units R019, R020, R021, and R029 and all exempt and/or de minimus emissions units:
  - a. the monthly VOC and HAP emission rate for all coatings and cleanup materials, in pounds from each of the above emissions units;
  - b. the rolling, 12-month summation of VOC emissions (i.e., the VOC emissions from the current month added to the summation of the VOC emissions from the previous 11 months) for all of the above emissions units;
  - c. the calculated individual HAP emission for the current month, in pounds or tons, for each of the above emissions units;; and
  - d. the rolling 12-month summation of individual HAP emissions (i.e., the individual HAP emissions from the current month added to the summation of the individual HAP emissions from the previous 11 months) for all the above emissions units.
7. 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.
8. The permit to install for emissions unit R019, R020 and R021 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (mg/m<sup>3</sup>): 188.4 mg/m<sup>3</sup>

Maximum Hourly Emission Rate (lbs/hr): 3.86 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 65.91

MAGLC (ug/m<sup>3</sup>): 4,486 ug/m<sup>3</sup>

**Issued: 2/21/2008**

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, 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");
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

Emissions Unit ID: R020

- b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### D. Reporting Requirements

1. In accordance with paragraph A.1.c of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. all periods of time, when the emissions unit was in operation, during which the differential pressure of the PTE was not maintained at or above 0.004 inch water during any rolling, 15-minute period, based on the average of the 1-minute values recorded by the data logger;
  - b. all periods of time, when the emissions unit was in operation, during which the NMOC concentration from the exhaust of the concentrator was in excess of 20 ppm;
  - c. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified above; and
  - d. any continuous monitoring system downtime while the emissions unit was in operation, including documentation of date, time, duration and reason, along with any corrective action taken.
2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC and individual HAPs and any exceedances of the of the rolling, 12-month coating usage limitation. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
3. The permittee shall submit annual reports that specify the total VOC emissions from emissions units R019, R020, R021 and R029 for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### E. Testing Requirements

**Issued: 2/21/2008**

1. Compliance with the emission limitation(s) in Section A.I.1 of these terms and conditions shall be determined in accordance with the following method(s):
  - a. Emission Limitation:  
The VOC emissions shall be vented to the control system ( bed concentrator and the thermal incinerator) which shall maintain an overall reduction of 90%, by weight.

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 permit issuance.
- ii. The emission testing shall be conducted to demonstrate compliance with the 90% overall control efficiency requirement. (The permittee has previously demonstrated that the PTE satisfies the criteria specified in Method 204 of 40 CFR Part 51, Appendix M.)
- iii. The control efficiency (i.e., the percent reduction in mass emissions between the inlet to the concentrator and the combined outlets of the thermal oxidizer and concentrator) shall be determined in accordance with Method 25A of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- iv. The test(s) shall be conducted while emissions units R019, R020, R021 and R029 are operating at or near their maximum capacities, unless otherwise specified or approved by the Ohio EPA, Central District Office.
- v. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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

Emissions Unit ID: R020

emission test(s).

- vi. Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test, 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.
- vii. 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

- b. Emission Limitation:  
The volatile organic compound (VOC) emissions from emissions units R019, R020, R021 and R029 shall not exceed 6.8 lbs/hr.

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated based upon the emissions testing required in Section A.V.1.a above.

- c. Emissions Limitation:  
The maximum annual coating usage for emissions units R019, R020, and R021 shall not exceed 51,000 gallons adhesive and 660 gallons clean-up solvent, based upon a rolling, 12 month summation of the monthly usages.

Applicable Compliance Method:

Compliance with the annual usage restrictions shall be determined by summing the monthly usages for the calendar year, i.e., the value calculated in section C.5.c, above.

- d. Emissions Limitation:  
The emissions of VOC from emissions units R019, R020, and R021 shall not exceed 16.1 tons per year, including cleanup, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the annual emissions limitation shall be determined by

**Issued: 2/21/2008**

summing the monthly emissions, i.e., the value calculated in section C.5.g above.

- e. **Emission Limitation:**  
The total facility-wide emission rate from R019, R020, R021 and R029 shall not exceed 17.7 tons VOC/yr, including cleanup emissions.

**Applicable Compliance Method:**

Compliance with the controlled annual VOC emission limitation shall be demonstrated based upon the record keeping requirements contained in section C.6. of this permit. The overall control efficiency shall be demonstrated by emission testing conducted in accordance with Section C.6.b of this permit..

- f. **Emission Limitation**  
Facility-wide emissions shall not exceed 9.9 of an individual HAP per year, based upon a rolling, 12-month summation of the monthly emissions.

**Applicable Compliance Method**

Compliance shall be demonstrated by record keeping in section C.6.d, above.

Formulation data or USEPA Method 24 shall be used to determine the VOC content of the adhesives and cleanup materials.

**F. Miscellaneous Requirements**

None

Issued: 2/21/2008

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. 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 -(R021) - SEP Rear Assembly coating line w/2 booths and 1 infrared oven (modification of PTI 01-06663)**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The volatile organic compound (VOC) emissions from emissions units R019, R020, R021 and R029 shall not exceed 6.8 lbs/hr.  See sections A.2.a, A.2.b, B.1, B.2, B.3 and E.1 below.
OAC rule 3745-21-07(G)(2)	None. See section A.2.c below.
OAC rule 3745-31-05(C) (synthetic minor to avoid Title V and MACT requirements)	See section A.2.d and B.1below.

**2. Additional Terms and Conditions**

- 2.a The emissions of VOC from emissions units R019, R020, and R021 shall not exceed 16.1 tons per year, including cleanup, based upon a rolling, 12-month summation of the monthly emissions
- 2.b The VOC emissions shall be vented to the control system (concentrator and the thermal oxidizer ) which shall maintain an overall reduction of 90%, by weight. In order to achieve this reduction, the permittee shall maintain a permanent total enclosure for capturing all the VOC emissions from this emissions unit.
- 2.c The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d Facility-wide emissions shall not exceed 9.9 tons of individual hazardous air pollutant (HAP) and 17.7 tons of total VOC emissions based on a rolling, 12-

Emissions Unit ID: R021

month summation of monthly emissions.

Facility-wide emissions shall be determined from a summation of monthly emissions from R019, R020, R021 and R029 and all emissions units that are exempted under permit by rule (OAC rule 3745-31-03) and/or a de minimis (OAC rule 3745-15-05) exemption.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact.

## **B. Operational Restrictions**

1. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12 month summation of the coating usage, upon issuance of this permit. The maximum annual coating usage for emissions units R019, R020, and R021 shall not exceed 51,000 gallons adhesive and 660 gallons clean-up solvent, based upon a rolling, 12 month summation of the monthly usages.
2. The permanent total enclosure (PTE) serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a permanent total enclosure in Method 204 (40 CFR Part 51, Appendix M) whenever the emissions unit is in operation. The PTE shall be maintained under negative pressure at a minimum differential pressure of not less than 0.004 inch of water during any rolling, 15-minute period, based on the average of the 1-minute values.
3. The non-methane organic compound (NMOC) concentration of the exhaust gases from the concentrator shall not exceed 20 ppm, when the emissions unit is in operation.
4. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time, whenever the emissions unit is in operation, shall not be more than 50 degrees below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

## **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain and operate monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the PTE. The monitoring and recording devices shall be calibrated, operated and maintained in accordance with the procedures specified below.

Emissions Unit ID: **R021**

The differential pressure monitor and recorder will serve as instrumentation for ensuring the integrity of the PTE. The instrumentation shall be maintained in accordance with the most recent Quality Assurance/Quality Control (QA/QC) Plan. In accordance with the QA/QC plan, the differential pressure gauge shall be calibrated to ensure the electrical integrity of the transmitter output for the purpose of span adjustments and shall be calibrated by the manufacturer during facility shutdowns.

2. The permittee shall operate and maintain continuous monitoring device and recorder(s) which measure and record the NMOC emissions in parts per million (ppm) from the concentrator in accordance with the procedures specified in the most recent Quality Assurance/Quality Control (QA/QC) Plan. In accordance with the QA/QC plan, the primary NMOC monitor shall be calibrated with a certified span gas at nominal concentration of 10 ppm isobutylene.
3. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
4. The permittee shall collect and record the following information for each day:
  - a. the difference in pressure between the PTE and the surrounding area(s), in inches of water, for each rolling, 15-minute period, as measured once per minute;
  - b. the NMOC concentrations of the exhaust gases from the concentrator, in ppm, as measured once per minute; and
  - c. 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 below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance, as measured once per minute; and
  - d. a log or record of downtime for the capture (collection) system, control device(s), and monitoring equipment when the associated emissions unit was in operation.
5. The permittee shall maintain monthly records of the following information:

**Issued: 2/21/2008**

- a. the company identification of each coating and cleanup material employed in emissions units R019, R020, R021 and R029;
- b. the VOC content, in pounds per gallon, of each coating and cleanup material, as employed;
- c. the number of gallons of each adhesive and cleanup material employed in each of emissions units R019, R020 and R021;
- d. the total number of gallons of all adhesives and the total number of gallons of all cleanup materials employed in each of emissions units R019, R020 and R021;
- e. the total uncontrolled VOC emission rate for all adhesives and cleanup materials), in pounds per month (i.e., the summation of (Section C.5.b) x (Section C.5.c), for each coating and cleanup material);
- f. the total controlled VOC emission rate for all adhesives and cleanup materials, in pounds per month (i.e., the value from Section C.5.e., above) multiplied by the overall control efficiency from the most recent emission test that demonstrated the emission unit was in compliance;
- g. the total controlled rolling, 12-month VOC emission rate for all adhesives and cleanup materials, in tons per year, calculated by summing the monthly values from Section C.5.f for the current month and previous 11 months and dividing by 2000 pounds per ton;
- h. the results of the monthly differential pressure monitor electrical integrity tests (transmitter output) and record of the correlation calculations, including the time and date of the test, the differential pressure monitor readout during testing, and if the readout is not within specification values, a description of the problem and corrective actions taken to correct this problem; and
- i. a summation of the results of the weekly manual calibrations of the primary NMOC monitor, including the time and date of calibration, the certified calibration gas concentration, the primary NMOC monitor concentration readout during calibration, and if the readout is not within +/- 10% of the calibration gas value, a description of the problem and corrective actions taken to correct this problem.

Emissions Unit ID: **R021**

6. The permittee shall collect and record the following information during each month for the purpose of determining annual VOC and HAP emissions from emissions units R019, R020, and R021 and all exempt and/or de minimus emissions units:
  - a. the monthly VOC and HAP emission rate for all coatings and cleanup materials, in pounds from each of the above emissions units;
  - b. the rolling, 12-month summation of VOC emissions (i.e., the VOC emissions from the current month added to the summation of the VOC emissions from the previous 11 months) for all of the above emissions units;
  - c. the calculated individual HAP emission for the current month, in pounds or tons, for each of the above emissions units; and
  - d. the rolling 12-month summation of individual HAP emissions (i.e., the individual HAP emissions from the current month added to the summation of the individual HAP emissions from the previous 11 months) for all the above emissions units.
7. 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.
8. The permit to install for emissions unit R019, R020, R021 and R029 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (mg/m<sup>3</sup>): 188.4 mg/m<sup>3</sup>

Maximum Hourly Emission Rate (lbs/hr): 3.86 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 65.91MAGLC (ug/m<sup>3</sup>): 4,486 ug/m<sup>3</sup>

Physical changes to or changes in the method of operation of the emissions unit after

**Issued: 2/21/2008**

its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, 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");
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

Emissions Unit ID: R021

- b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### D. Reporting Requirements

1. In accordance with paragraph A.1.c of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. all periods of time, when the emissions unit was in operation, during which the differential pressure of the PTE was not maintained at or above 0.004 inch water during any rolling, 15-minute period, based on the average of the 1-minute values recorded by the data logger;
  - b. all periods of time, when the emissions unit was in operation, during which the NMOC concentration from the exhaust of the carbon bed concentrator was in excess of 20 ppm;
  - c. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator did not comply with the temperature limitation specified above; and
  - d. any continuous monitoring system downtime while the emissions unit was in operation, including documentation of date, time, duration and reason, along with any corrective action taken.
2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC and individual HAPs and any exceedances of the of the rolling, 12-month coating usage limitation. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
3. The permittee shall submit annual reports that specify the total VOC emissions from emissions units R019, R020, R021 and R029 for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### E. Testing Requirements

**Issued: 2/21/2008**

1. Compliance with the emission limitation(s) in Section A.I.1 of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:

- The VOC emissions shall be vented to the control system (concentrator and the thermal incinerator) which shall maintain an overall reduction of 90%, by weight.

- 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 permit issuance.
    - ii. The emission testing shall be conducted to demonstrate compliance with the 90% overall control efficiency requirement. (The permittee has previously demonstrated that the PTE satisfies the criteria specified in Method 204 of 40 CFR Part 51, Appendix M.)
    - iii. The control efficiency (i.e., the percent reduction in mass emissions between the inlet to the concentrator and the combined outlets of the thermal oxidizer and concentrator) shall be determined in accordance with Method 25A of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
    - iv. The test(s) shall be conducted while emissions units R019, R020, R021 and R029 are operating at or near their maximum capacities, unless otherwise specified or approved by the Ohio EPA, Central District Office.
    - v. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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).

Emissions Unit ID: **R021**

- vi. Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test, 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.
  - vii. 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.
- b. Emission Limitation:  
The volatile organic compound (VOC) emissions from emissions units R019, R020, R021 and R029 shall not exceed 6.8 lbs/hr.

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated based upon the emissions testing required in Section A.V.1.a above.

- c. Emissions Limitation:  
The maximum annual coating usage for emissions units R019, R020, and R021 shall not exceed 51,000 gallons adhesive and 660 gallons clean-up solvent, based upon a rolling, 12 month summation of the monthly usages.

Applicable Compliance Method:

Compliance with the annual usage restrictions shall be determined by summing the monthly usages for the calendar year, i.e., the value calculated in section C.5.c, above.

- d. Emissions Limitation:  
The emissions of VOC from emissions units R019, R020, and R021 shall not exceed 16.1 tons per year, including cleanup, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the annual emissions limitation shall be determined by summing the monthly emissions, i.e., the value calculated in section C.5.g above.

**Issued: 2/21/2008**

Emissions Unit ID: **R021**

**Issued: 2/21/2008**

- e. Emission Limitation:  
The total facility-wide emissions from R019, R020, R021 and R029 shall not exceed 17.7 tons VOC/yr, including cleanup emissions.

Applicable Compliance Method:

Compliance with the controlled annual VOC emission limitation shall be demonstrated based upon the record keeping requirements contained in section C.6. The overall control efficiency shall be demonstrated by emission testing conducted in accordance with Section C.6.b of this permit.

- f. Emission Limitation  
Facility-wide emissions shall not exceed 9.9 of an individual HAP per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method

Compliance shall be demonstrated by record keeping in section C.6.d, above.

**F. Miscellaneous Requirements**

None

## PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

### A. 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 - (R029) - Touch-up spray booths

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The volatile organic compound (VOC) emissions from emissions units R019, R020, R021 and R029 shall not exceed 6.8 lbs/hr.  See sections A.2.a, A.2.b, B.1, B.2, B.3 and E.1 below.
OAC rule 3745-21-07(G)(2)	None. See section A.2.c below.
OAC rule 3745-31-05(C) (synthetic minor to avoid Title V and MACT requirements)	See section A.2.d and B.1 below.

### 2. Additional Terms and Conditions

- 2.a The emissions of VOC from this emissions unit shall not exceed 1.4 tons per year, based upon a rolling, 12-month summation of the monthly emissions.
- 2.b The VOC emissions shall be vented to the control system ( concentrator and the thermal oxidizer ) which shall maintain an overall reduction of 90%, by weight. In order to achieve this reduction, the permittee shall maintain a permanent total enclosure for capturing all the VOC emissions from this emissions unit.
- 2.c The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d Facility-wide emissions shall not exceed 9.9 tons of individual hazardous air pollutant (HAP) and 17.7 tons of total VOC emissions based on a rolling, 12-month summation of monthly emissions.

Facility-wide emissions shall be determined from a summation of monthly emissions from R019, R020, R021 and R029 and all emissions units that are

Emissions Unit ID: **R029**

exempted under permit by rule (OAC rule 3745-31-03) and/or a de minimis (OAC rule 3745-15-05) exemption.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact.

## B. Operational Restrictions

1. The maximum annual coating usage for this emissions unit shall not exceed 30,113 lbs coating, based upon a rolling, 12 month summation of the monthly usages.

The permittee shall maintain monthly records of the coating usage in this emissions unit. To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage</u>
1	2,500
1-2	5,000
1-3	7,500
1-4	10,000
1-5	12,500
1-6	15,000
1-7	17,500
1-8	20,000
1-9	22,500
1-10	25,000
1-11	27,500
1-12	30,113

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the coating usage figures.

2. The permanent total enclosure serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a permanent total enclosure in Method 204 (40 CFR Part 51, Appendix M) whenever the emissions unit is in operation. The PTE shall be maintained under negative pressure at a minimum differential pressure of not less than 0.004 inch of water during any rolling, 15-minute period, based on the

average of the 1-minute values.

3. The non-methane organic compound (NMOC) concentration of the exhaust gases from the concentrator shall not exceed 20 ppm, when the emissions unit is in operation.
4. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time, whenever the emissions unit is in operation, shall not be more than 50 degrees below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

### **C. Monitoring and/or Recordkeeping Requirements**

1. 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.
2. The permittee shall maintain monthly records of the following information:
  - a. the coating usage for each month; and
  - b. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the coating usage figures.

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative coating usage for each calendar month.

3. The permittee shall collect and record the following information during each month for the purpose of determining annual VOC and HAP emissions from emissions units R019, R020, and R021 and all exempt and/or de minimus emissions units:
  - a. the monthly VOC and HAP emission rate for all coatings and cleanup materials, in pounds from each of the above emissions units;
  - b. the rolling, 12-month summation of VOC emissions (i.e., the VOC emissions from the current month added to the summation of the OC emissions from the previous 11 months) for all of the above emissions units;
  - c. the calculated individual HAP emission for the current month, in pounds or tons, for each of the above emissions units; and

- d. the rolling 12-month summation of individual HAP emissions (i.e., the individual HAP emissions from the current month added to the summation of the individual HAP emissions from the previous 11 months) for all the above emissions units.

**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC and individual HAPs and any exceedances of the of the rolling, 12-month coating usage limitation. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
2. The permittee shall submit annual reports that specify the total VOC emissions from emissions units R019, R020, R021 and R029 for the previous calendar year. These reports shall be submitted by January 31 of each year.

## E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I.1 of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:

The VOC emissions shall be vented to the control system (concentrator and the thermal incinerator) which shall maintain an overall reduction of 90%, by weight.

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 permit issuance.
    - ii. The emission testing shall be conducted to demonstrate compliance with the 90% overall control efficiency requirement. (The permittee has previously demonstrated that the PTE satisfies the criteria specified in Method 204 of 40 CFR Part 51, Appendix M.)
    - iii. The control efficiency (i.e., the percent reduction in mass emissions between the inlet to the carbon bed concentrator and the combined outlets of the thermal incinerator and carbon bed concentrator) shall be determined in accordance with Method 25A of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
    - iv. The test(s) shall be conducted while emissions units R019, R020, R021 and R029 are operating at or near their maximum capacities, unless otherwise specified or approved by the Ohio EPA, Central District Office.
    - v. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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).

- vi. Personnel from the Ohio EPA, Central District Office shall be permitted to witness the test, 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.
- vii. 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

b. Emission Limitation:

The volatile organic compound (VOC) emissions from emissions units R019, R020, R021 and R029 shall not exceed 6.8 lbs/hr.

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated based upon the emissions testing required in Section A.V.1.a above.

c. Emissions Limitation:

The maximum annual coating usage for this emissions unit shall not exceed 30,113 lbs coating, based upon a rolling, 12 month summation of the monthly usages.

Applicable Compliance Method:

Compliance with the annual usage restrictions shall be determined by summing the monthly usages for the calendar year, i.e., the value calculated in section C.2.b, above.

d. Emission Limitation:

The total emission rate from R019, R020, R021 and R029 shall not exceed 17.7 tons VOC/yr, including cleanup emissions.

Applicable Compliance Method:

Compliance with the controlled annual VOC emission limitation shall be

**TS Trim Industries**  
**PTI Application: 01-12182**  
**Issue**

**Facility ID: 0125031840**

**Emissions Unit ID: R029**

demonstrated based upon the record keeping requirements contained in Section C.2 of this permit. The overall control efficiency shall be demonstrated by emission testing conducted in accordance with Section E.1 of this permit.

- e. **Emission Limitation**  
Facility-wide emissions shall not exceed 9.9 of an individual HAP per year, based upon a rolling, 12-month summation of the monthly emissions.

**Applicable Compliance Method**

Compliance shall be demonstrated by record keeping in section C.2.e, above.

**F. Miscellaneous Requirements**

1. Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.