



State of Ohio Environmental Protection Agency

**STREET ADDRESS:**

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Columbus, Ohio 43215

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**MAILING ADDRESS:**

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

8/5/2009

Certified Mail

Mrs. Tracy Boros  
Norplas Industries Inc.  
7825 Caple Blvd  
Northwood, OH 43619

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

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 0387000362  
Permit Number: P0104751  
Permit Type: Administrative Modification  
County: Wood

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission ("ERAC") under Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and describe the action complained of and the grounds for the appeal. The appeal must be filed with the ERAC within thirty (30) days after notice of the Director's action. A filing fee of \$70.00 must be submitted to the ERAC with the appeal, although the ERAC, has discretion to reduce the amount of the filing fee if you can demonstrate (by affidavit) that payment of the full amount of the fee would cause extreme hardship. If you file an appeal of this action, you must notify Ohio EPA of the filing of the appeal (by providing a copy to the Director) within three (3) days of filing your appeal with the ERAC. Ohio EPA requests that a copy of the appeal also be provided to the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the ERAC at the following address:

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

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

Sincerely,

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*  
Ohio EPA DAPC, Northwest District Office

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director





**State of Ohio Environmental Protection Agency  
Division of Air Pollution Control**

**FINAL**

**Air Pollution Permit-to-Install  
for  
Norplas Industries Inc.**

Facility ID: 0387000362  
Permit Number: P0104751  
Permit Type: Administrative Modification  
Issued: 8/5/2009  
Effective: 8/5/2009





State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Air Pollution Permit-to-Install**  
for  
Norplas Industries Inc.

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State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install**  
**Permit Number:** P0104751  
**Facility ID:** 0387000362  
**Effective Date:** 8/5/2009

## Authorization

Facility ID: 0387000362  
Facility Description: injection molding and painting of automotive plastic components  
Application Number(s): A0037306  
Permit Number: P0104751  
Permit Description: Administrative modification to emissions unit R001, to increase the carbon monoxide (CO) limit from 1.3 lbs/hr to 2.4 lbs/hr, based on testing results.  
Permit Type: Administrative Modification  
Permit Fee: \$0.00  
Issue Date: 8/5/2009  
Effective Date: 8/5/2009

This document constitutes issuance to:

Norplas Industries Inc.  
7825 Caple Blvd.  
Northwood, OH 43619

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

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

Ohio EPA DAPC, Northwest District Office  
347 North Dunbridge Road  
Bowling Green, OH 43402  
(419)352-8461

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski  
Director



State of Ohio Environmental Protection Agency  
 Division of Air Pollution Control

**Final Permit-to-Install**  
**Permit Number:** P0104751  
**Facility ID:** 0387000362  
**Effective Date:** 8/5/2009

## Authorization (continued)

Permit Number: P0104751  
 Permit Description: Administrative modification to emissions unit R001, to increase the carbon monoxide (CO) limit from 1.3 lbs/hr to 2.4 lbs/hr, based on testing results.

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

<b>Emissions Unit ID:</b>	<b>R001</b>
Company Equipment ID:	Paint Line
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install**  
**Permit Number:** P0104751  
**Facility ID:** 0387000362  
**Effective Date:** 8/5/2009

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



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

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

**2. Severability Clause**

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

**3. General Requirements**

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



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

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

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



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

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

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

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

## 5. Scheduled Maintenance/Malfunction Reporting

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

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

## 6. Compliance Requirements

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

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

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



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

## **7. Best Available Technology**

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

## **8. Air Pollution Nuisance**

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

## **9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.
- 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 Ohio EPA DAPC, Northwest District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted



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

## **10. Applicability**

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

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

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



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

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

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

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

**13. Construction Compliance Certification**

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

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

**14. Public Disclosure**

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

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

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

**16. Fees**

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



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install**  
**Permit Number:** P0104751  
**Facility ID:** 0387000362  
**Effective Date:** 8/5/2009

**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Northwest District Office must be notified in writing of any transfer of this permit.

**18. Risk Management Plans**

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

**19. Title IV Provisions**

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



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install**  
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**Facility ID:** 0387000362  
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## **B. Facility-Wide Terms and Conditions**



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install**  
**Permit Number:** P0104751  
**Facility ID:** 0387000362  
**Effective Date:** 8/5/2009

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - a) None.
2. The following emissions unit contained in this permit is subject to Maximum Achievable Control Technology (MACT) requirements under 40 CFR Part 63, Subpart PPPP (Surface Coating of Plastic Parts and Products) and 40 CFR Part 63, Subpart MMMM (Surface Coating of Miscellaneous Metal Parts and Products): R001. 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 the appropriate Ohio EPA District office or local air agency.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install**  
**Permit Number:** P0104751  
**Facility ID:** 0387000362  
**Effective Date:** 8/5/2009

## **C. Emissions Unit Terms and Conditions**



**1. R001, Paint Line**

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

Paint line R001, subject to metal and plastic parts coating MACT, controlled by an RTO. This PTI is an administrative modification to PTI #03-10137 for R001, to increase the carbon monoxide (CO) limit from 1.3 lbs/hr to 2.4 lbs/hr, based on testing.

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>From the thermal oxidizer exhaust stack:            47.2 lbs organic compounds (OC)/hr;            3.1 lbs nitrogen oxides (NOx)/hr;            1.9 lbs particulate matter less than 10 microns (PM10)/hr; and            2.4 lbs carbon monoxide (CO)/hr.</p> <p>From all combustion units associated with this emissions unit:            18.99 tons NOX/year;            8.5 tons PM10/year; and            10.51 tons CO/year.</p> <p>18.8 tons OC/month [from the thermal oxidizer exhaust stack and fugitive emissions emitted at the facility, combined];</p> <p>See b)(2)a. through b)(2)g.</p>
b.	OAC rule 3745-31-05(D)	<p>398.8 tons OC/year, based upon a rolling, 12-month summation of the monthly OC emission rates [from the thermal oxidizer exhaust stack and total fugitive emissions*, combined];</p> <p>*This accounts for OCs emitted (from paint sludge) at the facility, where the sludge is generated, and at the processing/disposal facility (off site), combined.</p>
c.	OAC rule 3745-17-11(B)	<p>3.3 lbs particulate emissions (PE)/hr</p> <p>See b)(2)h.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-11(C)	See b)(2)i.
e.	OAC rule 3745-17-07(A)	See b)(2)h. and b)(2)j.
f.	OAC rule 3745-21-07(G)(2)	See b)(2)k. and b)(2)l.
g.	40 CFR Part 63, Subpart MMMM (40 CFR 63.3880-3981)  [In accordance with 40 CFR 63.3881 (a) & (b) and 40 CFR 63.3882 (a), (b), and (e), this emissions unit is a miscellaneous metal parts coating line with add-on controls (a regenerative thermal oxidizer) subject to the emissions limitations/control measures specified in Subpart MMMM.]  [In accordance with 40 CFR 63.3890(b)(1), this emissions unit meets the applicability criteria of the general use category. See b)(2)m.]	Comply with the following limit: For each existing general use coating affected source, limit organic hazardous air pollutant (HAP) emissions to no more than 0.31 kg (2.6 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period. [40 CFR 63.3890(b)(1)]  Compliance with this standard shall be demonstrated by following the applicable procedures in 63.3891 and using at least one of the three compliance options listed in paragraphs (a) through (c) of this rule. [40 CFR 63.3891]  See b)(2)m. through b)(2)o.
h.	40 CFR 63.1-15 [40 CFR 63.3901]	Table 2 to Subpart MMMM of Part 63 – Applicability of General Provisions to Subpart MMMM of Part 63 – shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
i.	40 CFR Part 63, Subpart PPPP (40 CFR 63.4480-4581)  [In accordance with 40 CFR 63.4481 (a) & (b) and 40 CFR 63.4482(a), (b), and (e), this emissions unit is an existing plastic parts coating line with add-on controls (a regenerative thermal oxidizer) subject to the emissions limitations/control measures specified in Subpart PPPP.]  [In accordance with 40 CFR 63.3890(b)(1), this emissions unit meets the applicability criteria of the thermoplastic olefin (TPO) coating use category. See b)(2)p.]	Comply with the following limit: For each existing TPO coating affected source, limit organic hazardous air pollutant (HAP) emissions to no more than 0.26 kg (0.26 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period. [40 CFR 63.4490(b)(1)]  Compliance with this standard shall be demonstrated by following the applicable procedures in 63.4491 and using at least one of the three compliance options listed in paragraphs (a) through (c) of this rule. [40 CFR 63.4491]  See b)(2)o. through b)(2)q.
j.	40 CFR 63.1-15 [40 CFR 63.4501]	Table 2 to Subpart PPPP of Part 63 – Applicability of General Provisions to Subpart PPPP of Part 63 – shows which parts of the General Provisions in 40 CFR 63.1-15 apply.



(2) Additional Terms and Conditions

- a. Best Available Technology (BAT) for this emissions unit has been determined to be the use of a permanent total enclosure capturing exhaust gases from all paint booths, flash-off areas and bake ovens and exhausting to a regenerative thermal oxidizer in conjunction with an exhaust recirculation system. The bake ovens shall be fitted with low NOx burners. The regenerative thermal oxidizer shall ensure that ninety five percent of the carbon in the organic material being incinerated is oxidized to carbon dioxide. Best available technology for paint application has been determined to be an automatic or robotic paint spray system using electrostatic applicators or equivalent technology and use of a water wash system for control of particulate emissions. The paint spray system shall achieve transfer efficiencies of 35 – 50%.
- b. The permanent total enclosure shall be constructed to totally enclose the emissions unit such that all volatile organic compound emissions are captured, contained, and directed to the control device.
- c. The permanent total enclosure shall be maintained under negative pressure whenever the emissions unit is in operation, and shall be designed and maintained to have an average facial velocity of air through each natural draft opening of at least 200 feet per minute (3,600 m/hr). Compliance with the average facial velocity shall be demonstrated during the compliance test, by either using an air flow monitor or a differential pressure gauge at each natural draft opening, and maintaining the required facial velocity or the corresponding negative pressure. The permanent total enclosure shall meet all of the following criteria if the capture efficiency of the enclosure and control device is to be assumed to be 100%:
  - i. Any natural draft opening shall be at least four equivalent opening diameters, or 4 times the diameter of the opening, from each VOC emitting point. An equivalent diameter is the diameter of a circle that has the same area as the opening. If the opening is not circular the equivalent diameter (ED) is calculated as follows:
$$ED = (4 \text{ area}/\pi)^{0.5}$$
  - ii. The total area of all natural draft openings ( $A_N$ ) shall not exceed 5 percent of the total surface area of the enclosure ( $A_T$ ), i.e, the four walls, floor, and ceiling. The natural draft opening to enclosure area ratio (NEAR) is calculated as follows:
$$NEAR = A_N / A_T$$
  - iii. The direction of air flow through all natural draft openings shall be into the enclosure, with an average facial velocity of no less than 200 feet per minute (3,600 m/hr) or a pressure drop of 0.013 mm Hg (0.007 in. H<sub>2</sub>O).
  - iv. All access doors and windows to the enclosure that do not meet the requirements of a natural draft opening and whose surface areas are not included in the 5 percent surface area determination in  $A_N$ , shall be completely closed to any air movement during process operations.



- v. All VOC emissions shall be captured and contained for discharge through the control device.
- d. 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 40 CFR, Part 51, Appendix M, Reference Method 204, and shall capture all of the VOC emissions from this emissions unit.
- e. All of the VOC emissions from this emissions unit shall be vented to the thermal oxidizer that shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation.
- f. The permittee shall operate the waterwash control system whenever this emissions unit is in operation.
- g. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11(B) and 3745-17-11(C), 3745-17-07(A), 40 CFR, Part 63, Subpart MMMM, and 40 CFR, Part 63, Subpart PPPP.
- h. The requirements to comply with OAC rules 3745-17-07(A) and 3745-17-11(B) shall terminate on the date the U.S. EPA approves the requirements based on OAC rule 3745-17-11(C) as a revision to the Ohio SIP for particulate emissions.
- i. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.
- j. Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
- k. The control requirements specified by this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
- l. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S.EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S.EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S.EPA approves the rule revision:

None.

The emission limitations and control requirements from the amended 21-07 rule, and the associated operational restrictions and the monitoring, record keeping, and reporting requirements contained in this permit, shall become federally enforceable on the date the U.S.EPA approves the revised OAC rule 3745-21-07



as a revision to the Ohio State Implementation Plan. The following terms shall become federally enforceable after U.S.EPA approves the rule revision:

None.

- m. The permittee is required to notify the Ohio EPA, Northwest District Office prior to changing coating substrates as identified in 40 CFR 63.3881(a). The options for compliance when using more than one type of coating is described in 40 CFR 63.3890(c).
- n. The permittee has elected to use the compliance option provided by 40 CFR 63.3891(c) – emission rate with add-on controls option. This is accomplished by demonstrating that the organic HAP emission rate for the coating operation is less than or equal to the applicable emission limit in 63.3890, calculated as a rolling 12-month emission rate and determined on a monthly basis. The permittee may use any of the three compliance options [63.3891(a), (b), or (c)], as described in 63.3891, however, the permittee must meet all of the stated requirements of each option when it is used. [See 40 CFR 63.3880-3981.]
- o. The permittee may comply with 40 CFR Part 63, Subpart M and Subpart P separately, or may select a predominant activity, or may calculate a facility-specific emission limit from the relative amount of coating activity that is subject to each emission limit. These options are described in 40 CFR 63.3881(e) and 63.4481(e).
- p. The permittee is required to notify the Ohio EPA, Northwest District Office prior to changing coating substrates as identified in 40 CFR 63.4481(a). The options for compliance when using more than one type of coating is described in 40 CFR 63.4490(c).
- q. The permittee has elected to use the compliance option provided by 40 CFR 63.4491(c) – emission rate with add-on controls option. This is accomplished by demonstrating that the organic HAP emission rate for the coating operation is less than or equal to the applicable emission limit in 63.4490, calculated as a rolling 12-month emission rate and determined on a monthly basis. The permittee may use any of the three compliance options [63.4491(a), (b), or (c)], as described in 63.4491, however, the permittee must meet all of the requirements of each option when it is used. [See 40 CFR 63.4480-4581.]

c) Operational Restrictions

- (1) The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.013 mm Hg (0.007 in. H<sub>2</sub>O), whenever the emissions unit is in operation.
- (2) The permittee shall operate and maintain the waterwash control system for the surface coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The waterwash control shall be employed during all periods of coating application to control particulate emissions.



- (3) The permittee shall expeditiously repair the waterwash control system or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.
  - (4) See 40 CFR 63.3892 and 63.3893 for Subpart MMMM operational requirements.
  - (5) See 40 CFR 63.4492 and 63.4493 for Subpart PPPP operational requirements.
- d) Monitoring and/or Recordkeeping Requirements
- (1) In order to maintain compliance with the applicable emission limitation contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit controlled by the thermal oxidizer is in operation, shall not be less than 1512 degrees Fahrenheit.
  - (2) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit is in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within  $\pm 1$  percent of the temperature being measured or  $\pm 5$  degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and record the following information each day the emissions unit is in operation:
    - a. all 3-hour blocks of time, when the emissions unit controlled by the thermal oxidizer was in operation, during which the average combustion temperature within the thermal oxidizer was less than 1512 degrees Fahrenheit; and
    - b. a log or record of the operating time for the capture (collection) system, thermal oxidizer, monitoring equipment, and the associated emissions unit.
- These records shall be maintained at the facility for a period of three years.
- (3) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
    - a. the date and time the deviation began;
    - b. the magnitude of the deviation at that time;
    - c. the date the investigation was conducted;
    - d. the name(s) of the personnel who conducted the investigation; and
    - e. the findings and recommendations.



- (4) 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/limit specified in this permit, 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. a description of the corrective action;
  - b. the date corrective action was completed;
  - c. the date and time the deviation ended;
  - d. the total period of time (in minutes) during which there was a deviation;
  - e. the temperature readings immediately after the corrective action was implemented; and
  - f. the name(s) of the personnel who performed the work.

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

The temperature limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate for the controlled pollutant. In addition, approved revisions to the temperature limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (5) The permittee shall measure, document/calculate, and maintain a permanent record of the following information for the permanent total enclosure, which may be the same record documented during the compliance test:
- a. the measured diameter of each natural draft opening;
  - b. the distance measured from each natural draft opening to each VOC emitting point;
  - c. the total calculated surface area of all natural draft openings and the surface area of the enclosure=s four walls, floor, and ceiling;
  - d. the calculation or demonstration that the distance from each VOC emitting point to each natural draft opening is at least 4 times the diameter of the opening; and
  - e. the calculation demonstrating that the sum of the surface areas of all of the natural draft openings to the enclosure is not more than 5 percent of the sum of the surface areas of the enclosure=s four walls, floor, and ceiling.



- (6) The permittee shall install, operate, and maintain monitoring devices and a recorder that continuously monitor and record the differential pressure between the inside and outside of the permanent total enclosure when the emissions unit is in operation. The monitoring and recording devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day:

- a. all three-hour blocks of time during which the difference in pressure between the permanent total enclosure and the surrounding areas is not maintained at or above the minimum pressure differential of 0.007 inches of water, as a three-hour average; and
  - b. a log or record of downtime for the capture (collection) system when the emissions unit was in operation.
- (7) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the waterwash control system, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (8) The permittee shall conduct periodic inspections of the waterwash control to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (9) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the waterwash control while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (10) The permittee shall document each inspection (periodic and annual) of the waterwash control system and shall maintain the following information:
- a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.



- (11) The permittee shall maintain records that document any time periods when the waterwash control was not in service when the emissions unit was in operation, as well as, a record of all operations during which the waterwash control was not operated according to the manufacturer=s recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- (12) The permittee shall collect and record the following information each month for this emissions unit:
- a. The company identification for each coating and cleanup material employed;
  - b. The amount of sludge collected, in pounds;
  - c. The total facility fugitive emissions of OC resulting from the sludge, in tons, calculated as follows:  
$$EF = 0.005 \text{ lb OC/lb of sludge collected}^* \times [\text{the amount of sludge from d)(6)b. above}]/2000$$
where EF is the facility fugitive emissions of OC attributed to paint sludge, in tons per month;
  - d. The total number of hours the emissions unit was in operation;
  - e. The total stack emissions of OC, in tons, calculated as follows:  
$$ES = \text{the total number of hours the emissions unit was in operation [from d)(6)d. above]} \times st/2000$$
where ES is the stack OC emissions, in tons per month, and st is the hourly OC emissions rate (lbs/hr), as determined during the most recent emission testing;
  - f. The total OC emissions generated at the facility (fugitive + stack), in tons [d)(6)c. + d)(6)d.];
  - g. The total fugitive emissions of OC generated off site and resulting from the sludge, in tons, calculated as follows:  
$$Ef = 0.04 \text{ lb OC/lb of sludge collected}^* \times (\text{the amt. of sludge from b. above})/2000$$
where Ef = the off-site fugitive emissions of OC attributed to paint sludge, in tons per month;
  - h. The total OC emissions (fugitive emissions generated at the facility+ stack emissions generated at the facility + fugitive emissions generated off-site), in tons (c. + g. + e.); and
  - i. The rolling, 12-month summation of the total monthly OC emission rates [calculated by summing the OC emissions (from h. above), for the previous 11 calendar months + the OC emissions for the current month], in tons.
- (13) See 40 CFR 63.3930, 63.3931, 63.3961, and 63.3963 for Subpart Mmmm monitoring and recordkeeping requirements.
- (14) See 40 CFR 63.4530, 63.4531, 63.4561, and 63.4563 for Subpart Pppp monitoring and recordkeeping requirements.



e) Reporting Requirements

- (1) The permittee shall submit quarterly summaries of the following records:
  - a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average combustion temperature within the thermal oxidizer was less than 1512 degrees Fahrenheit;
  - b. a log of the operating time for the capture system, thermal oxidizer, monitoring equipment, and the emissions unit;
  - c. an identification of each incident of deviation described in "a" (above) where a prompt investigation was not conducted;
  - d. an identification of each incident of deviation described in "a" where prompt corrective action, that would bring the temperature into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - e. an identification of each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s).

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 submit deviation (excursion) reports that identify any time periods when the emissions units were in operation and the VOC emissions were not vented to the RTO. Each report shall be submitted within 30 days after the deviation occurs.
- (3) The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, monitoring equipment, when the associated emissions unit was in operation.
- (4) The permittee shall identify in the quarterly deviation report, all three-hour blocks of time, when the emissions unit was in operation, during which the permanent total enclosure was not maintained at the minimum pressure differential of 0.007 inches of water.
- (5) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. any daily record showing that the waterwash control system was not in service or not operated according to manufacturer=s recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

- (6) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. All exceedances of the rolling, 12-month OC emission limitation of 398.8 tons; and



- b. All exceedances of the monthly OC emission limitation of 18.8 tons.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

- (7) See 40 CFR 63.3910 and 63.3920 for Subpart M monitoring and recordkeeping requirements.
- (8) See 40 CFR 63.4510 and 63.4520 for Subpart P monitoring and recordkeeping requirements.

f) Testing Requirements

- (1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 6 months after permit issuance, unless otherwise approved by the Ohio EPA, Northwest District Office;
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for NO<sub>x</sub>, PE, PM<sub>10</sub>, CO, and OC and the capture and control efficiencies for OC.
  - c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates:
    - i. For NO<sub>x</sub>, Methods 1 through 4 and 7 of 40 CFR, Part 60, Appendix A;
    - ii. For OC, Methods 1 through 4 and 25 or 25A of 40 CFR, Part 60, Appendix A;
    - iii. For PE, Methods 1 through 4 and 5 of 40 CFR, Part 60, Appendix A;
    - iv. For PM<sub>10</sub>, Methods 1 through 4 and 201 or 201A of 40 CFR, Part 60, Appendix A;
    - v. For CO, Methods 1 through 4 and 10 of 40 CFR, Part 60, Appendix A.
  - d. The test methods which must be employed to demonstrate compliance with the capture efficiency and control efficiency limitations for organic compounds are specified below. If applicable, alternative USEPA-approved test methods may be used with prior approval from the Ohio EPA.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement). The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in



OAC rule 3745-21-10” or the approved alternative test protocol (e.g., “the mass balance protocol approved on 10/25/95. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.”

- e. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
  - f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
  - g. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
  - h. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.
- (2) Compliance with the emissions limitations in section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:
- a. Emission Limitations:  
  
3.3 lbs PE/hour  
  
Applicable Compliance Method:  
  
The permittee shall demonstrate compliance with the hourly PE limitation based on the results of emissions testing conducted in accordance with f)(1) above.
  - b. Emission Limitations:  
  
47.2 lbs OC/hour  
  
Applicable Compliance Method:  
  
The permittee shall demonstrate compliance with the hourly OC limitation based on the results of emissions testing conducted in accordance with f)(1) above.



- c. Emission Limitations:  
  
3.1 lbs NOx/hour  
  
Applicable Compliance Method:  
  
The permittee shall demonstrate compliance with the hourly NOx limitation based on the results of emissions testing conducted in accordance with f)(1) above.
  
- d. Emission Limitations:  
  
1.9 lbs PM10/hour  
  
Applicable Compliance Method:  
  
The permittee shall demonstrate compliance with the hourly PM10 limitation based on the results of emissions testing conducted in accordance with f)(1) above.
  
- e. Emission Limitations:  
  
2.4 lbs CO/hour, and 10.51 tons CO/yr  
  
Applicable Compliance Method:  
  
The permittee shall demonstrate compliance with the hourly CO limitation based on the results of emissions testing conducted in accordance with f)(1) above.  
  
Compliance with the annual allowable CO emission limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).
  
- f. Emission Limitations:  
  
18.8 tons OC/month [from the thermal oxidizer exhaust stack and fugitive emissions emitted at the facility, combined]  
  
Applicable Compliance Method:  
  
The record keeping requirements specified in Section d)(12) of this permit shall be used to determine compliance with the monthly OC emission limitations.
  
- g. Emission Limitations:  
  
398.8 tons OC/year, based upon a rolling, 12-month summation of the monthly OC emission rates [from the thermal oxidizer exhaust stack and fugitive emissions\*, combined] \*This accounts for OCs emitted from paint sludge at the facility, where the sludge is generated, and at the processing/disposal facility off site, combined.  
  
Applicable Compliance Method:



The record keeping requirements specified in Section d)(12) of this permit shall be used to determine compliance with the rolling, 12-month OC emission limitation.

h. Emission Limitations:

18.99 tons NO<sub>x</sub>/year [from all combustion units associated with this emissions unit]

Applicable Compliance Method:

The permittee shall determine compliance with the annual allowable emission limitation for NO<sub>x</sub> as follows:

- i. Multiply the permittee-supplied emission factor of 0.081lb NO<sub>x</sub>/mmBtu by the maximum hourly heat input (15.1 mmBtu/hr);
- ii. Multiply f)(2)(j)i. by 8760 and divide by 2000;
- iii. Multiply the hourly NO<sub>x</sub> emission rate (lbs/hr, obtained from the results of the most recent emissions testing of the thermal oxidizer stack) by 8760, and then divide by 2000; and
- iv. Add f)(2)(j)ii. +f)(2)(j)iii.

i. Emission Limitations:

8.5 tons PM<sub>10</sub>/year [from all combustion units associated with this emissions unit]

Applicable Compliance Method:

The permittee shall determine compliance with the annual allowable emission limitation for PM<sub>10</sub> as follows:

- i. Multiply the emission factor from AP-42, Fifth Edition, Table 1.4-2, of 0.0075lb PM<sub>10</sub>/mmBtu by the maximum hourly heat input (15.1 mmBtu/hr);
- ii. Multiply f)(2)(j)i. by 8760 and divide by 2000;
- iii. Multiply the hourly PM<sub>10</sub> emission rate (lbs/hr, obtained from the results of the most recent emissions testing of the thermal oxidizer stack) by 8760, and then divide by 2000; and
- iv. Add f)(2)(j)ii. +f)(2)(j)iii.

j. Emission Limitations:

For each existing general use coating affected source, limit organic hazardous air pollutant (HAP) emissions to no more than 0.31 kg (2.6 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period.



Applicable Compliance Method:

The permittee shall demonstrate compliance with the emission limitation in accordance with 40 CFR 63.3891(a) through (c) and 40 CFR 63.3940 through 40 CFR 63.3968.

k. Emission Limitations:

For each existing TPO coating affected source, limit organic hazardous air pollutant (HAP) emissions to no more than 0.26 kg (0.26 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the emission limitation based on the results of emissions testing conducted in accordance with 40 CFR 63.4491(a) through(c) and 40 CFR 63.4540 through 40 CFR 63.4568.

g) Miscellaneous Requirements

- (1) None.