State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL **CERTIFIED MAIL**
FRANKLIN COUNTY

Street Address:
122 S. Front Street

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

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049

Application No: 01-01341
Fac ID: 0125041046
DATE: 3/2/2006

Core Molding Technologies, Inc.
Todd King
800 Manor Park Dr
Columbus, OH 43228

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 by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. 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, Ohio 43215

Sincerely,

Michael W. Ahern

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

CC: **USEPA** **CDO**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: 3/2/2006**
Terms and Conditions	**Effective Date: 3/2/2006**

FINAL PERMIT TO INSTALL 01-01341

Application Number:	01-01341
Facility ID:	0125041046
Permit Fee:	**$1200**
Name of Facility:	Core Molding Technologies, Inc.
Person to Contact:	Todd King
Address:	800 Manor Park Dr Columbus, OH 43228

Location of proposed air contaminant source(s) [emissions unit(s)]:
800 Manor Park Dr
Columbus, **Ohio**

Description of proposed emissions unit(s):
Compression molding press.

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

Joseph P. Koncelik

Director

Part I - GENERAL TERMS AND CONDITIONS

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

1. Monitoring and Related Recordkeeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. The operating conditions existing at the time of sampling or measurement.

b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to

the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

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

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

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

2. Scheduled Maintenance/Malfunction Reporting

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

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

3. Risk Management Plans

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

4. Title IV Provisions

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

5. Severability Clause

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

6. General Requirements

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

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be

kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

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

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

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

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

i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or

required under this permit.

iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit-To-Operate Application

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

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

11. Best Available Technology

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

12. Air Pollution Nuisance

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

13. Permit-To-Install

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

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

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Permit Transfers

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

4. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

5. Construction of New Sources(s)

This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

6. Public Disclosure

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

7. Applicability

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

8. Construction Compliance Certification

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

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

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

C. Permit-To-Install Summary of Allowable Emissions

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

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

Pollutant	Tons Per Year
OC	31.82
NOx	1.38
CO	1.16
PE	4.83
SO2	0.005

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

None

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

None

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P058 - Press 219	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 4.39 pounds per hour and 40 lbs/day. Organic compound (OC) emissions shall not exceed 7.3 tons per year. Compliance with this rule also includes compliance with the requirements of 40 CFR Part 63, Subpart WWWW. See section A.I.2.a
	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are equivalent to or less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR Part 63, Subpart A	See section A.I.2.a below.
	40 CFR Part 63, Subpart WWWW	See sections A.II.1, A.III.2-3, and A.IV.2-3 below.

2. Additional Terms and Conditions

2.a This emissions unit is subject to the applicable provisions of the National Emission Standards for Hazardous Air pollutants (NESHAP) as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63. The application and enforcement of these standards are delegated to Ohio EPA.

The requirements of 40 CFR Part 63 are also federally enforceable.

II. Operational Restrictions

1. By April 21, 2006, the permittee shall uncover, unwrap or expose only one charge per mold cycle per compression molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting.

III. Monitoring and/or Recordkeeping Requirements

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

   a. The company identification for the material(s) employed (i.e., sheet molding compound (SMC), in-mold compound (IMC), and Mold Release (MR)).

   b. The number of pounds of SMC, IMC, and MR, as employed.

   c. The organic compound content of each material, in pound of organic compounds per pound of material.

   d. The organic compound emission rate for SMC, IMC, and MR, in pounds of organic compounds per day. Multiply the daily SMC, IMC, and MR usages by the respective organic content of each SMC, IMC, and MR to determine the organic compound emission rate for each SMC, IMC, and MR.

   e. The total organic compound emission rate for SMC, IMC, and MR, in pounds of organic compounds per day (i.e., the summation of the pounds per day organic compound emission rates for SMC, IMC and MR).

   f. The total number of hours of operation.

   g. The average hourly organic compound emission rate for materials, i.e., (e)/(f), in pounds of organic compounds per hour (average).

2. By April 21, 2006, the permittee shall maintain a copy of each notification and report submitted to comply with the requirements of 40 CFR Part 63, Subpart WWWW.

3. By April 21, 2006, the permittee shall maintain a certified statement that the permittee is in compliance with the work practice requirements in Table 4 of 40 CFR Part 63, Subpart WWWW.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

   a. An identification of each day during which the average hourly OC emissions from coatings and cleanup materials exceeded 4.39 lbs/hr, and the actual average hourly OC emissions for each such day.

   b. An identification of each day during which the average hourly OC emissions from coatings and cleanup materials exceeded 40 lbs/day, and the actual OC emissions for each such day.

   These reports are due by the dates described in Part 1- General Terms and Conditions of this permit under section (A).

2. After April 21, 2006 the permittee shall submit semi-annual reports that identify each deviation from the work practice standard required by section A.II.1 above. These reports shall include the following information:

   a. The total operating time of the emissions unit during the reporting period;

   b. The number, duration, and cause of the deviation.

   c. The corrective action taken.

3. The permittee shall submit an initial notification report as required by 40 CFR 63.9(b)(2) of Subpart A and shall be submitted by the dates specified by 40 CFR 63.9(b)(2) of Subpart A.

V. Testing Requirements

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

   a. Emission Limitation: Organic compound (OC) emissions shall not exceed 4.39 lbs/hr and 40 lbs/day.

      Applicable Compliance Method: Compliance shall be based upon the record

keeping requirements as specified in section A.III.1.

b. Emission Limitation: Organic compound (OC) emissions shall not exceed 7.3 tons per year.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in section A.III.1 as the sum of the OC emissions for the calendar year.

2. Formulation data shall be used to determine the organic compound content of the MR. The closed molding emission factor specified in Section 4.4, Table 4.4-2 of USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors (2%, by weight of the starting monomer emitted) shall be used to determine the organic compound contents of the SMC and IMC.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P058 - Press 219		Air Toxics Policy, see below.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions units P058 and P059 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: Styrene

   TLV (ug/m3):85,202

Maximum Hourly Emission Rate (lbs/hr): 3.01

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 583.9

MAGLC (ug/m3): 2,029

2. 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.).

3. 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.);

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.

4. The requirements specified above regarding Ohio EPA's "Air Toxic Policy" shall not apply to this emissions unit after the compliance date for this emissions unit in 40 CFR Part 63, Subpart WWWW (April 21, 2006).

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P059 - Press 220	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 4.39 pounds per hour and 40 lbs/day. Organic compound (OC) emissions shall not exceed 7.3 tons per year. Compliance with this rule also includes compliance with the requirements of 40 CFR Part 63 Subpart WWWW. See section A.I.2.a
	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are equivalent to or less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR Part 63, Subpart A	See section A.I.2.a below.
	40 CFR 63, Subpart WWWW	See sections A.II.1, A.III.2-3 , and A.IV.2-3 below.

2. Additional Terms and Conditions

2.a This emissions unit is subject to the applicable provisions of the National Emission Standards for Hazardous Air pollutants (NESHAP) as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63. The application and enforcement of these standards are delegated to Ohio EPA. The requirements of 40 CFR Part 63 are also federally enforceable.

II. Operational Restrictions

1. By April 21, 2006, the permittee shall uncover, unwrap or expose only one charge per mold cycle per compression molding machine. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle. For machines with robotic loaders, no more than one charge may be exposed prior to the loader. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper. Hoppers must be closed when not adding materials. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting.

III. Monitoring and/or Recordkeeping Requirements

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

   a. The company identification for the material(s) employed (i.e., sheet molding compound (SMC), in-mold compound (IMC), and Mold Release (MR)).

   b. The number of pounds of SMC, IMC, and MR, as employed.

   c. The organic compound content of each material, in pound of organic compounds per pound of material.

   d. The organic compound emission rate for SMC, IMC, and MR, in pounds of organic compounds per day. Multiply the daily SMC, IMC, and MR usages by the respective organic content of each SMC, IMC, and MR to determine the organic compound emission rate for each SMC, IMC, and MR.

   e. The total organic compound emission rate for SMC, IMC, and MR, in pounds of organic compounds per day (i.e., the summation of the pounds per day organic compound emission rates for SMC, IMC and MR).

f. The total number of hours of operation.

g. The average hourly organic compound emission rate for materials, i.e., (e)/(f), in pounds of organic compounds per hour (average).

2. By April 21, 2006, the permittee shall maintain a copy of each notification and report submitted to comply with the requirements of 40 CFR Part 63, Subpart WWWW.

3. By April 21, 2006, the permittee shall maintain a certified statement that the permittee is in compliance with the work practice requirements in Table 4 of 40 CFR Part 63, Subpart WWWW.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

   a. An identification of each day during which the average hourly OC emissions from coatings and cleanup materials exceeded 4.39 lbs/hr, and the actual average hourly OC emissions for each such day.

   b. An identification of each day during which the average hourly OC emissions from coatings and cleanup materials exceeded 40 lbs/day, and the actual OC emissions for each such day.

   These reports are due by the dates described in Part 1- General Terms and Conditions of this permit under section (A).

2. After April 21, 2006 the permittee shall submit semi-annual reports that identify each deviation from the work practice standard required by section A.II.1 above. These reports shall include the following information:

   a. The total operating time of the emissions unit during the reporting period;

   b. The number, duration, and cause of the deviation.

   c. The corrective action taken.

3. The permittee shall submit an initial notification report as required by 40 CFR 63.9(b)(2) of Subpart A and shall be submitted by the dates specified by 40 CFR 63.9(b)(2) of Subpart A.

V. Testing Requirements

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

a. Emission Limitation: Organic compound (OC) emissions shall not exceed 4.39 lbs/hr and 40 lbs/day.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in section A.III.1.

b. Emission Limitation: Organic compound (OC) emissions shall not exceed 7.3 tons per year.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in section A.III.1 as the sum of the OC emissions for the calendar year.

2. Formulation data shall be used to determine the organic compound content of the MR. The closed molding emission factor specified in Section 4.4, Table 4.4-2 of USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors (2%, by weight of the starting monomer emitted) shall be used to determine the organic compound contents of the SMC and IMC.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P059 - Press 220		Air Toxics Policy, see below.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions units P058 and P059 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: Styrene

   TLV (ug/m3):85,202

   Maximum Hourly Emission Rate (lbs/hr): 3.01

   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 583.9

MAGLC (ug/m3): 2,029

2. 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.).

3. 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.);

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.

4. The requirements specified above regarding Ohio EPA's "Air Toxic Policy" shall not apply to this emissions unit after the compliance date for this emissions unit in 40 CFR Part 63, Subpart WWWW (April 21, 2006).

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	
R009 - MD Line (plastics parts coating line) w/oven controlled by a PTE and RTO	OAC rule 3745-31-05(A)(3)	
		OAC rule 3745-17-07(A)
		OAC rule 3745-17-11(B)(1)
		OAC rule 3745-21-07(G)
		40 CFR Part 63, Subpart A
		40 CFR Part 63, Subpart PPPP

Applicable Emissions Limitations/Control Measures	
Organic Compound (OC) emissions shall not exceed 0.30 pound per hour and 1.31 tons per year. See sections A.I.2.a-c below. Emissions from natural gas usage in the incinerator and associated oven shall not exceed: 0.197 lb NOx/hr; 0.86 ton NOx/yr; 0.0012 lb SO2/hr; 0.005 ton SO2/yr; 0.17 lb CO/hr; 0.73 ton CO/yr; 0.015 lb PE/hr; 0.07 ton PE/yr; 0.02 lb OC/yr; and 0.1 ton OC/yr Visible particulate emissions (PE) shall not exceed 5% opacity. Compliance with this rule also includes compliance with the requirements of 40 CFR Part 63, Subpart PPPP and OAC rule 3745-17-11(B)(1).	The visible emission limitation specified in this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3). Particulate emissions from the application of coating shall not exceed 0.551 pound per hour. The organic compound (OC) emission limitations specified in this rule are less stringent than the OC emission limitations established pursuant to OAC rule 3745-31-05(A)(3). See section A.I.2.d below. See below.

2. Additional Terms and Conditions

2.a The permittee shall operate the particulate filtration system whenever this emissions unit is in operation.

2.b The PTE serving this emissions unit shall be installed and constructed in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M) .

2.c The permittee shall control OC emissions from this emissions unit through the use of a PTE and a Regenerative Thermal Oxidizer with a minimum control efficiency of 95%.

2.d This emissions unit is subject to the applicable provisions of the National Emission Standards for Hazardous Air Pollutants (NESHAP) as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63. The application and enforcement of these standards are delegated to Ohio EPA. The requirements of 40 CFR Part 63 are also federally enforceable.

2.e This emissions unit is subject to applicable sections of 40 CFR Part 63, Subpart A as denoted in 40 CFR Part 63, Subpart PPPP, Table 2.

II. Operational Restrictions

1. The minimum combustion temperature of the Regenerative Thermal Oxidizer shall be maintained at 1,400 degrees Fahrenheit or higher until initial emissions testing has been completed. Thereafter, the average temperature of the exhaust gases from the thermal incinerator, for any 3-hour block of time, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions units (R009 and R010) were in compliance.

2. The average combustion temperature in the firebox of the thermal oxidizer (or immediately downstream of the firebox before any substantial heat exchange) in any 3-hour block of time shall not be less than the average combustion temperature maintained during the most recent performance test that demonstrated compliance, and as recommended by the manufacturer until testing.

   [Subpart PPPP: 63.4492, 63.4568]

3. The permanent total enclosure shall be maintained under negative pressure, at a

minimum pressure differential that is not less than 0.007 inches of water, as averaged on an hourly basis, whenever the emission unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the Regenerative Thermal Oxidizer 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.

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

   a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

   b. All 3-hour blocks of time during which the average combustion temperature within the Regenerative Thermal Oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

   c. Prior to the initial compliance demonstration, all 3-hour blocks of time during which the average combustion temperature within the Regenerative Thermal Oxidizer, when the emissions unit was in operation, was less than 1350 degrees

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

   a. The name and identification number of each coating, as applied.

   b. The OC content of each coating, as applied, in pounds per gallon.

   c. The number of gallons of each coating employed.

   d. The name and identification of each cleanup material employed.

   e. The number of gallons of each cleanup material employed.

   f. The OC content of each cleanup material, in pounds per gallon.

   g. The total number of hours the emissions unit was operated.

h. The total uncontrolled OC emission rate from all coatings and cleanup materials, in pounds ([the summation of A.III.2.b X A.III.2.c for each coating] + [the summation of A.III.2.e X A.III.2.f for each cleanup material]).

i. The calculated, controlled OC emission rate for all coatings and cleanup materials, in pounds. The controlled OC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance. Prior to the initial compliance demonstration, the controlled OC emission rate shall be calculated based upon an assumed 95% overall control efficiency for the control equipment.

j. The average hourly controlled OC emission rate, in pounds per hour, i.e., A.III.2.i/A.III.2.g.

3. The permittee shall maintain and operate monitoring device(s) and a recorder which continuously measure and record the pressure differential from outside to inside the permanent total enclosure. The monitoring and recording device(s) shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

4. The permittee shall collect and record the following information for each operating day:

a. operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit;

b. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was less than 1350 degrees Fahrenheit; and

c. all rolling, 1-hour blocks of time during which the average pressure differential between the permanent total enclosure and the outside area(s), when the emissions unit was in operation, was less than 0.007 inch of water column.

5. 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.

6. The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the firebox of the thermal oxidizer (or immediately downstream of the firebox before any substantial

heat exchange) when the emissions unit is in operation. 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; and shall be capable of accurately measuring the temperature. The permittee shall collect and record the following information for each day:

a. all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal incinerator was less than the average combustion temperature maintained during the performance test that demonstrated compliance, or below the temperature recommended by the manufacturer until performance testing is completed; and

b. a log of the downtime for the capture (collection) system, thermal oxidizer, and/or monitoring equipment when the associated emissions unit was in operation.

[Subpart PPPP: 63.4530, 63.4568]

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

a. the name and identification number of each coating, thinner (includes any other additives and/or solvent blends), and cleanup/purge material, applied in the plastic parts coating operation(s), including information from the supplier or manufacturer, formulation data, and/or coating/material testing data;

b. the number of gallons or liters of each coating, thinner/additive, and cleanup/purge material employed;

c. the density of each coating, thinner/additive, and cleanup/purge material employed, in kg/liter or pounds/gallon, determined using ASTM Method D1475-98 or from information provided by the supplier or manufacturer of the material;

d. the mass fraction of organic Hazardous Air Pollutants (HAP) for each coating, thinner/additive, and cleanup/purge material applied during the month, as a weight fraction (e.g., lbs of HAP/lb of coating or kg HAP/kg coating), using one of the following methods:

i. Method 311 from 40 CFR Part 63, Appendix A;
ii. Method 24 from 40 CFR Part 60, Appendix A if all nonaqueous volatile matter is to be used for the mass fraction of HAP; or
iii. information from the supplier or manufacturer of the materials, where the mass fraction of organic HAP can be calculated from the density and the mass of HAP per gallon of each material (lbs HAP/gallon of material ÷ lbs/gallon of material, or calculated in kg/liter);

e. the mass fraction of coating solids (pounds of coating solids/pound of coating, or kg/kg) for each coating applied, determined using one of the following methods:

   i. Method 24 from 40 CFR Part 60, Appendix A
   ii. information from the supplier or manufacturer of the coatings, where the mass fraction of coating solids can be calculated from the density and the mass of solids per gallon of each material (lbs solids/gallon of coating ÷ lbs/gallon of coating, or calculated in kg/kg);

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

$$HAP = \sum_{i=1}^{r} (VOL_i)(D_i)(W_i)$$

where:

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

VOL_i is the volume of material "i" documented in (b) above, in gallons or liters;

D_i is the density of material "i" as documented in (c) above, in lb/gallon or kg/liter.

W_i is the mass fraction of organic HAP in material "i" as calculated in (d) above, in lb/lb or kg/kg.

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

$H_1 = HAP_c + HAP_t + HAP_{cu}$

H_1 is the total mass of organic HAP in the coatings (HAP_c), thinners/additives

(HAP_t), and cleanup/purge materials (HAP_{cu}) applied each month in the coating operation "1", in pound or kg of HAP, the sum of the total mass of HAP calculated for each, above.

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

$$M_s = \sum_{h=1}^{m} (VOL_h)(D_h)(M_h)$$

where:

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

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

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

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

m is the number of coatings applied during the month.

h. if for the controlled coating operation, the permittee is performing liquid-liquid material balances each month, as required in this permit, the organic HAP emission reduction for the solvent recovered each month shall be calculated using a collection and recovery efficiency calculated as follows:

$$R_V = 100\ [\ M_{VR} / [\sum_{h=1}^{c} (VOL_h)(D_h)(W_h) + \sum_{j=1}^{t} (VOL_j)(D_j)(W_j) + \sum_{k=1}^{s} (VOL_k)(D_k)(W_k)]]$$

where:

R_V is the volatile organic matter collection and recovery efficiency of the solvent recovery system during the month, in percent;

M_{VR} is the mass of volatile organic matter recovered by the solvent recovery system during the month, in lb or kg.

VOL_h is the volume of coating "h", used in the coating operation controlled by the solvent recovery system during the month, documented in (b) above, in gallons or liters;

D_h is the density of coating "h" as documented in (c) above, in lb/gallon or kg/liter;

W_h is the mass fraction of volatile organic matter for coating "h", lbs of volatile organic matter/lb of coating (or kg/kg), calculated using Method 24 from 40 CFR Part 60, Appendix A or from information provided by the supplier or manufacturer of the coatings, which can be calculated from the density and mass of volatile organic matter per gallon of each coating (lbs volatile organic matter/gallon of coating ÷ lbs/gallon of coating, or calculated in kg/liter);

c is the number of coatings applied during the month.

VOL_j is the volume of thinner/additive "j" documented in (b) above, in gallons or liters.

D_j is the density of thinner/additive "j" as documented in (c) above, in lb/gallon or kg/liter.

W_j is the mass fraction of volatile organic matter for thinner/additive "j", lbs of volatile organic matter/lb of thinner (or kg/kg), calculated using Method 24 from 40 CFR Part 60, Appendix A or from information provided by the supplier or manufacturer of the thinners/additives, which can be calculated from the density and mass of volatile organic matter per gallon of each thinner/additive (lbs volatile organic matter/gallon of thinner ÷ lbs/gallon of thinner, or calculated in kg/liter).

t is the number of thinners/additives applied during the month.

VOL_k is the volume of cleanup/purge material "k" documented in (b) above, in gallons or liters.

D_k is the density of cleanup/purge material "k" as documented in (c) above, in lb/gallon or kg/liter.

W_k is the mass fraction of volatile organic matter for cleanup/purge material "k", lbs of volatile organic matter/lb of cleanup (or kg/kg), calculated using Method 24 from 40 CFR Part 60, Appendix A or from information provided by the supplier or manufacturer of the cleanup/purge, which can be calculated from the density and mass of volatile organic matter per gallon of each cleanup/purge material (lbs volatile organic matter/gallon of cleanup/purge ÷ lbs/gallon of

cleanup/purge, or calculated in kg/liter).

s is the number of cleanup/purge materials applied during the month.

i. the mass of organic HAP emission reduction for the coating operations controlled by the solvent recovery system using liquid-liquid balance, for the coatings, thinners/additives, and cleanup/purge materials recovered during the month, calculated as follows:

$$HAP_{rec} = (HAP_c + HAP_t + HAP_{cu})\ (R_v/100)$$

where:

HAP_{rec} is the mass of organic HAP emission reduction for the coating operation controlled by the solvent recovery system using a liquid-liquid material balance during the month, in lb or kg.

HAP_c is the total mass of organic HAP in the coatings used during the month in the coating operations controlled by the solvent recovery system, calculated as follows:

$$HAP_c = \sum_{h=1}^{r} (VOL_h)\ (D_h)\ (W_h)$$

where:

HAP_c is the total mass of organic HAP in the coatings used during the month in the coating operations controlled by the solvent recovery system, in lb or kg.

VOL_h is the volume of coating "h" used during the month in the coating operations controlled by the solvent recovery system, in gallons or liters.

D_h is the density of coating "h" used during the month in the coating operations controlled by the solvent recovery system, in lb/gallon or kg/liter;

W_h is the mass fraction of organic HAP in coating "h" used during the month in the coating operations controlled by the solvent recovery system, in lb/lb or kg/kg;

r is the number of coatings used in the coating operations controlled by the solvent recovery system during the month the volatile organic matter is recovered.

HAP_t is the total mass of organic HAP in the thinners/additives used during the month in the coating operations controlled by the solvent recovery system, calculated as follows:

$$HAP_t = \sum_{j=1}^{q} (VOL_j)(D_j)(W_j)$$

where:

HAP_t is the total mass of organic HAP in the thinners/additives used during the month in the coating operations controlled by the solvent recovery system, in lb or kg.

VOL_j is the volume of thinner/additive "j" used during the month in the coating operations controlled by the solvent recovery system, in gallons or liters.

D_j is the density of thinner/additive "j" used during the month in the coating operations controlled by the solvent recovery system, in lb/gallon or kg/liter;

W_j is the mass fraction of organic HAP in thinner/additive "j" used during the month in the coating operations controlled by the solvent recovery system, in lb/lb or kg/kg;

q is the number of thinners/additives used in the coating operations controlled by the solvent recovery system during the month the volatile organic matter is recovered.

HAP_{cu} is the total mass of organic HAP in the cleanup/purge materials used during the month in the coating operations controlled by the solvent recovery system, calculated as follows:

$$HAP_{cu} = \sum_{k=1}^{s} (VOL_k)(D_k)(W_k)$$

where:

HAP_{cu} is the total mass of organic HAP in the cleanup/purge materials used during the month in the coating operations controlled by the solvent recovery system, in lb or kg.

VOL_k is the volume of cleanup/purge material "k" used during the month in the coating operations controlled by the solvent recovery system, in gallons or liters.

D_k is the density of cleanup/purge material "k" used during the month in the coating operations controlled by the solvent recovery system, in lb/gallon or kg/liter;

W_k is the mass fraction of organic HAP in cleanup/purge material "k" used during the month in the coating operations controlled by the solvent recovery system, in lb/lb or kg/kg;

s is the number of cleanup/purge materials used in the coating operations controlled by the solvent recovery system during the month the volatile organic mater is recovered.

R_V is the volatile organic matter collection and recovery efficiency of the solvent recovery system during the month, in percent, from (h) above;

j. the mass of organic HAP emission reduction for the month for the controlled coating operation using a capture system and add-on controls, calculated as follows:

$$HAP_{contr} = (A_c + B_t + C_{cu} - R_w - H_{dev})\ (CE/100 \times DRE/100)$$

where:

HAP_{contr} is the mass of organic HAP emission reduction for the controlled coating operations during each month, in lb or kg.

A_c is the total mass of organic HAP in the coatings used in the coating operations controlled by the add-on collection and control system during the month, calculated as follows:

$$A_c = \sum_{h=1}^{r} (VOL_h)\ (D_h)\ (W_h)$$

where:

A_c is the total mass of organic HAP in the coatings used in the coating

operations controlled by the add-on collection and control system during the month, in lb or kg.

VOL_h is the volume of coating "h" used in the coating operations controlled by the add-on collection and control system during the month, in gallons or liters.

D_h is the density of coating "h" used in the coating operations controlled by the add-on collection and control system during the month, in lb/gallon or kg/liter;

W_h is the mass fraction of organic HAP in coating "h" used in the coating operations controlled by the add-on collection and control system during the month, in lb/lb or kg/kg;

r is the number of coatings used in the coating operations controlled by the add-on collection and control system during the month.

B_t is the total mass of organic HAP in the thinners/additives used in the coating operations controlled by the add-on collection and control system during the month, calculated as follows:

$$B_t = \sum_{j=1}^{q} (VOL_j)(D_j)(W_j)$$

where:

B_t is the total mass of organic HAP in the thinners/additives used in the coating operations controlled by the add-on collection and control system during the month, in lb or kg.

VOL_j is the volume of thinner/additive "j" used in the coating operations controlled by the add-on collection and control system during the month, in gallons or liters.

D_j is the density of thinner/additive "j" used in the coating operations controlled by the add-on collection and control system during the month, in lb/gallon or kg/liter;

W_j is the mass fraction of organic HAP in thinner/additive "j" used in the coating operations controlled by the add-on collection and control system during the month, in lb/lb or kg/kg;

q is the number of thinners/additives used in the coating operations controlled by the add-on collection and control system during the month.

C_{cu} is the total mass of organic HAP in the cleanup/purge materials used in the

coating operations controlled by the add-on collection and control system during the month, calculated as follows:

$$C_{cu} = \sum_{k=1}^{s} (VOL_k)(D_k)(W_k)$$

where:

C_{cu} is the total mass of organic HAP in the cleanup/purge materials used in the coating operations controlled by the add-on collection and control system during the month, in lb or kg.

VOL_k is the volume of cleanup/purge material "k" used in the coating operations controlled by the add-on collection and control system during the month, in gallons or liters.

D_k is the density of cleanup/purge material "k" used in the coating operations controlled by the add-on collection and control system during the month, in lb/gallon or kg/liter;

W_k is the mass fraction of organic HAP in cleanup/purge material "k" used in the coating operations controlled by the add-on collection and control system during the month, in lb/lb or kg/kg;

s is the number of cleanup/purge materials used in the coating operations controlled by the add-on collection and control system during the month.

R_w is the total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste TSDF for treatment or disposal during the compliance period, in lb or kg. (The value of zero can be assigned to R_w if the requirements for the allowance cannot be met, below*.)

H_{dev} is the total mass of organic HAP in the coatings, thinners/additives, and cleanup/purge materials applied during all periods of deviation during the month in the controlled coating operation(s), calculated as follows:

$$H_{dev} = \sum_{d=1}^{q} (VOL_d)(D_d)(W_d)$$

where:

H_{dev} is the total mass of organic HAP in the coatings, thinners/additives, and cleanup/purge materials applied during all periods of deviation during the month in the controlled coating operation(s), in lb or kg.

VOL_d is the volume of coating, thinner/additive, or cleanup/purge material "d" applied in the controlled coating operation(s) during periods of deviation during the month, in gallons or liters.

D_d is the density of coating, thinner/additive, or cleanup/purge material "d" applied in the controlled coating operation(s) during periods of deviation during the month, in lb/gallon or kg/liter;

W_d is the mass fraction of organic HAP in coating, thinner/additive, or cleanup/purge material "d" applied in the controlled coating operation(s) during periods of deviation during the month, in lb/lb or kg/kg;

q is the number of different coatings, thinners/additives, and cleanup/purge materials applied during periods of deviation during the month.

CE is the capture efficiency of the emission capture system vented to the add-on control device, in percent.

DRE is the organic HAP destruction or removal efficiency of the add-on control device, in percent.

* in order to use the allowance for R_w in the formula above, the total mass of organic HAP contained in the waste materials must be determined and the recovered amount documented, along with the records of the TSDF, the subparts under 40 CFR Parts 262, 264, 265, and 266 that apply to the TSDF, and the date the material was shipped. The methodology used to determine the amount of waste materials and total mass of organic HAP they contain must be documented. This must include the source of all data used in this determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations, as well as the month the allowance was applied in the compliance calculation.

k. the mass of organic HAP emissions for each month, calculated as follows:

$$HAP_T = [H_1 - \sum_{a=1}^{w}(HAP_{contr,\,a}) - \sum_{b=1}^{x}(HAP_{rec,\,b})$$

where:

HAP_T is the total mass of organic HAP emissions for the month, in lb or kg.

H_1 is the total mass of organic HAP emissions before add-on controls or recovery, from all coatings, thinners/additives, and cleanup/purge materials applied in the coating operation during the month, summed from the total mass of HAP calculated from all such materials, as required in (f) above, in lb or kg.

$HAP_{contr,\,a}$ is the total mass of organic HAP emission reduction for the month, for the add-on collection and control system for coating operation "a", calculated in (j) above.

$HAP_{rec,\,b}$ is the total mass of organic HAP emission reduction for the month, for the solvent recovery system using a liquid-liquid material balance, for coating operation "b", calculated as required in (i) above.

w is the number of controlled coating operations captured and vented to the add-on control system.

x is the number of coating operations controlled by a solvent recovery system using a liquid-liquid material balance.

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

$$HAP_{comply} = \sum_{y=1}^{12}(HAP_{T,\,y}) / \sum_{y=1}^{12}(M_{s,\,y})$$

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

$HAP_{T,\,y}$ is the total mass of organic HAP emissions from all materials used during month y, calculated in (k) above, in lb or kg.

$M_{s,\,y}$ is the total mass of coating solids used during month y, calculated in (g) above, in pounds or kg.

y is the identifier for the months;

m. continuous parameter monitoring system results and certification, and

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

8. The permittee shall also maintain the following records for the plastic parts coating line:

a. a copy of each notification, report, and supporting documentation submitted to comply with the NESHAP, including the results from each compliance demonstration and records establishing the operating limits during performance testing as required in 40 CFR 63.4492;

b. if using the predominant activity alternative under 40 CFR 63.4490(c)(1), records of the data and calculations used to determine the predominant activity; and

c. if using the facility specific emission limit alternative under 40 CFR 63.4490(c)(2), data used to calculate the facility-specific emission limit alternative.

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

[40 CFR 63.4530 & 40 CFR 63.4561]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that include the following information:

a. all periods of time during which the permanent total enclosure was not maintained at or greater than the required differential pressure of 0.007 inches of water, when the emissions unit was in operation;

b. an identification of each day, during which the average hourly OC emissions from all coatings and cleanup materials exceeded 0.30 pound per hour, and the actual average hourly OC emissions for each such day;

c. an identification of all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent performance test that demonstrated the emissions unit was in compliance, or below 1,350 degrees Fahrenheit until initial emissions testing has been completed; and

d. any record of downtime for the capture (collection) system, control device, and monitoring equipment, when the emissions unit was in operation.

These reports are due by the dates described in Part 1- General Terms and Conditions of this permit under section (A).

2. The permittee shall notify the Ohio EPA Central District Office in writing of any daily record showing that the particulate filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Central District Office within 30 days after the event occurs.

3. The permittee shall also submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

4. The permittee shall submit an initial notification report within 120 days after the emissions unit becomes subject to this subpart. The initial notification shall include the following information:

a. the name and address of the owner or operator;

b. the address, i.e., the physical location of the affected source;

c. an identification of the relevant standard (NESHAP) that is the basis of the notification and the compliance date;

d. a brief description of the nature, size, design, and method of operation of the source, including its operating design capacity and an identification of each point of emission for each hazardous air pollutant or a preliminary identification of each such point;

e. a statement of whether the affected source is a major source or an area source; and

f. the anticipated startup of the emissions unit following the issuance of the permit (or the date when construction or reconstruction was commenced if prior to the issuance of a permit).

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

[40 CFR 63.9(b) and Subpart PPPP: 63.4510]

5. The permittee shall submit an initial notification of compliance status by 5/19/08 or 30 days following the end of the initial compliance period, which begins 4/19/07 and ends 4/19/08, which shall contain the following information:

   a. company name and address;

   b. statement by a responsible official certifying the truth, accuracy, and completeness of the content of the report (officials name, title, and signature);

   c. the date of the report and beginning and ending dates of the reporting period;

   d. identification of compliance option(s) for each coating operation, i.e., compliant material option; with or without add-on controls; and if solvent recovery is applied for an emissions reduction;

   e. statement of whether the affected source achieved the emission limitations for the initial compliance period;

   f. if there was a deviation during the initial compliance period, a description of the deviation and statement of the cause and the calculations of emissions used to determine non-compliance with the applicable limits;

   g. calculations and supporting documentation (information from supplier or manufacturer or summary of testing results) for the following:

      i. mass fraction of organic HAP for one coating, one thinner or additive, and one cleanup/purge material;

      ii. the mass fraction of coating solids for one coating;

      iii. density for one coating, one thinner or additive, and one cleanup/purge material; or if the "compliant coating option" is used, only the example coating density;

iv. the amount of waste materials and mass of organic HAP contained in the waste materials for which a recovery credit is applied;

v. the calculation of kg (lb) organic HAP emitted per kg (lb) coating solids used for the compliance option(s), or if using the "compliant coating option", an example calculation of the organic HAP content for one coating;

vi. for the emissions rate without add-on controls:

(a) the calculation of the total mass of organic HAP emissions for each month;
(b) the calculation of the total mass of coating solids used each month; and
(c) the calculation of the 12-month organic HAP emission rate;

vii. for the emission rate with add-on controls:

(a) the calculation of the total mass of organic HAP emissions from the coatings, thinners/additives, and cleaning materials used each month;
(b) the calculation of the total mass of coating solids used each month;
(c) the calculation of the mass of organic HAP emission reduction for each month for the emission capture systems and add-on control devices;
(d) the calculation for the total mass of organic HAP emissions each month;
(e) the calculation of the 12-month organic HAP emission rate; and
(f) a statement of whether or not the work practice plan was developed and implemented;

viii. for the emission rate with add-on-controls (does do not apply to solvent recovery systems using a liquid-liquid material balance):

(a) a summary of the data and copies of the calculations supporting the determination that the each emissions capture system is a permanent total enclosure or a measurement of the emission capture system's efficiency, including the protocol followed;

(b) a summary of the results of each add-on control performance test; and

(c) a list of each emission capture system's add-on control device's operating limits and summary of the data used to calculate the limits.

h. a summary of the data and copies of the calculations supporting the determination that each emissions capture system is a permanent total enclosure or a measurement of the emission capture system's efficiency, including the protocol/procedures followed;

i. a summary of the results of any capture efficiency tests conducted and performance test conducted on each add-on control device;

j. a list of each emission capture system's add-on control device's operating limits and summary of the data used to calculate the limits; and

k. a statement of whether or not the work practice plan was developed and implemented.

[40 CFR 63.9(h)] & Subpart PPPP: 63.4510]

6. The permittee shall submit semiannual reports which shall be postmarked or delivered no later than July 31 or January 31 following the end of each semiannual reporting period (June 30 or December 31). The first semiannual compliance period shall begin the day after the end of the initial compliance period, as describes in this permit. The semiannual report shall containing the following information:

a. company name and address;

b. statement by a responsible official certifying the truth, accuracy, and completeness of the content of the report (officials name, title, and signature);

c. the date of the report and beginning and ending dates of the reporting period;

d. identification of compliance option(s) for each coating operation;

e. statement of whether the affected source achieved the emission limitations for the compliance period;

f. the calculation results for each rolling, 12-month organic HAP emission rate during the 6-month reporting period; and

g. if there were no deviations, a statement that there were no deviations from the emissions limitations during the reporting period; and if using add-on controls, a statement that there were no periods of time when the continuous parameter

monitoring systems were out-of-control;

h. if there were any deviations during the compliance period, the report shall include the following information:

i. deviations from coating applications with add-on control shall include the following information:

(a) the beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit;

(b) any periods of time when emissions bypassed the add-on control device and were diverted to the atmosphere;

(c) the calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred, including the total mass of organic HAP emissions from coatings, thinners/additives, and cleaning materials used each month of deviation from the applicable limitation(s);

(d) if applicable, the calculation used to determine mass of organic HAP in waste materials;

(e) the calculation of the total mass of coating solids used each month, as required in this permit;

(f) the calculation of the mass of organic HAP emission reduction each month by emission capture systems and add-on control devices, as required in this permit;

(g) the calculation of the total mass of organic HAP emission rate each month of deviation and the 12-month emission rate, as required in this permit, in kg (or lb) organic HAP per liter (or gallon) of coating solids used;

(h) the date and time that each malfunction started and stopped;

(i) a brief description of the continuous parameter monitoring system (CPMS);

(j) the date of the latest CPMS certification or audit;

(k) the date, time, and duration that each CPMS was inoperative or was out-of-control (except for zero/low-level and high-level checks);

(l) the date and time period and duration of each deviation from any

operating limit(s) contained in this permit, from Table 1 to this subpart;

(m) the date and time and duration of any bypass of the add-on control device and if each occurred during a period of startup, shutdown, or malfunction, or during another period;

(n) the total duration of deviation as a percent of the total source operating time, during the semiannual reporting period;

(o) a breakdown of the total duration of the deviations from the operating limits in Table 1 of this subpart and bypasses of the add-on control device during the semiannual reporting period into those that were due to startup, shutdown, control equipment problems, process problems, and other known or unknown causes;

(p) a summary of the total duration of CPMS downtime during the semiannual reporting period, and the total duration of the CPMS downtime as a percent of the total source operating time during the semiannual reporting period;

(q) a description of any changes in the CPMS, coating operation emission capture system, or add-on control device since the last semiannual reporting period;

(r) for each deviation from the work practice standards, a description of the deviation, the date and time period of the deviation, and the action taken to correct the deviation; and

(s) a statement of the cause of each deviation.

[Subpart PPPP: 63.4520(a)]

7. The permittee shall include startup, shutdown, and malfunction reports in the semiannual report if actions taken by the permittee during a startup, shutdown, and/or malfunction are consistent with the procedures specified in the facility startup, shutdown, and malfunction plan. The startup, shutdown, and/or malfunction report shall consist of a letter containing the name of the responsible official and his certification that all startup, shutdown, or malfunction events were conducted according to the plan.

If actions taken during any startup, shutdown, or malfunction were not consistent with the startup, shutdown, and malfunction plan, the permittee shall submit immediate startup, shutdown, and/or malfunction reports as follows:

a. within 2 working days after starting actions that are inconsistent with the plan, the permittee shall report these actions to the appropriate Ohio EPA District Office or local air agency, to be delivered by facsimile, telephone, or other means; and

b. unless alternative arrangements are made, within 7 working days after the end of the event, a letter shall be sent to the appropriate Ohio EPA District Office or local air agency and it shall contain:

i. the name, title, and signature of the responsible official who is certifying the accuracy of the report,
ii. an explanation of the circumstances of the event, i.e., the reasons for not following the startup, shutdown, and malfunction plan; and
iii. if any excess emissions and/or parameter monitoring exceedances have occurred.

[Subpart PPPP: 63.4500(c) & 63.6(e)(3)]

8. The permittee shall identify in the semiannual reports all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal incinerator was less than the average combustion temperature maintained and established during the most recent performance test that demonstrated compliance.

[Subpart PPPP: 63.4520]

V. Testing Requirements

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

a. Emission Limitations: Organic Compound (OC) emissions shall not exceed 0.30 pound per hour; The permittee shall control OC emissions from this emissions unit through the use of a PTE and a Regenerative Thermal Oxidizer with a minimum control efficiency of 95%.

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

i. The emission testing shall be conducted within 60 days after achieving the maximum production rate but no later than 180 days after initial

startup of the emissions unit.

ii. The following test method(s) shall be employed to determine the overall control efficiency of the control equipment serving this emissions unit: 40 CFR Part 60, Appendix A, Methods 1 through 4, 25 or 25A, and 40 CFR Part 51, Appendix M, Method 204.

iii. The test(s) shall be conducted while this emissions unit and R010 are venting OC emissions to the Regenerative Thermal oxidizer. Each emissions unit shall be operated at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

The overall control efficiency of the control equipment serving this emissions unit shall be demonstrated based upon the results of the capture efficiency and control efficiency tests specified above. 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 Section A.V.1.a.ii of this permit and OAC rule 3745-21-10. 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.

2. 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 no later than 180 days following the compliance date specified in the Additional Terms and Conditions of this permit.

b. The emission testing shall be conducted to demonstrate compliance with the limit in 40 CFR Part 63, Subpart PPPP

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Method 1 of 1A of Appendix A to 40 CFR Part 60, to select sampling sites and velocity traverse points;

Method 2, 2A, 2C, 2D, 2F or 2G of Appendix A to 40 CFR Part 60, as appropriate, to measure gas volumetric flow rate;

Method 3, 3A, or 3B of Appendix A to 40 CFR Part 60, as appropriate, for gas analysis to determine dry molecular weight;

Method 4 of Appendix A to 40 CFR Part 60, to determine stack gas moisture;

Method 25 or 25A, to determine the total gaseous organic mass emissions as carbon at the inlet and outlet of each add-on control device simultaneously, using:

Method 25 if testing an oxidizer with expected carbon concentrations to exceed 50 ppm

Method 25A if testing an oxidizer with expected carbon concentrations to be 50 ppm or less, or if the control is not an oxidizer; and

Method 204 A through 204F (appropriate method) of Appendix M to 40 CFR Part 51 to determine the capture efficiency.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

e. The total gaseous organic emissions mass flow rates shall be determined for the inlet and the outlet of each add-on control device for each of 3 test runs.

f. The total gaseous organic emissions mass flow rate, in kg/hr or pounds/hour, shall be calculated as follows:

$M_f = Q_{sd}\ C_c\ (12)\ (0.0416)\ (10^{-6})$

where:

M_f is the total gaseous organic emissions mass flow rate, in kg/hr.

Q_{sd} is the volumetric flow rate of gases entering or exiting the add-on control device, as determine by Method 2, 2A, 2C, 2D, 2F or 2G, in dscm/hour

C_c is the concentration of organic compounds as carbon in the vent gas, as determined by Method 25 or 25A, in parts per million by volume on a dry basis (ppmv).

0.0416 is the conversion factor for molar volume, Kg-moles per cubic meter (mol/m^3) @ 293 Kelvin and 760 mmHg.

g. For each test run the add-on control device organic emissions destruction or removal efficiency shall be calculated as follows:

$DRE = [(M_{fi} - M_{fo}) / M_{fi}] \times 100$

where

DRE is the organic emissions destruction or removal efficiency of the add-on control device, in percent

M_{fi} is the total gaseous organic emissions mass flow rate at the inlet(s) to the add-on control device(s), from the equation above, in kg/hour.

M_{fo} is the total gaseous organic emissions mass flow rate at the outlet(s) to the add-on control device(s), from the equation above, in kg/hour.

The emission destruction or removal efficiency of the add-on control device(s) shall be the average of the efficiencies determined in the three test runs.

3. Performance test results for emission capture systems and add-on control devices shall be submitted no later than 60 days after completion of the performance tests.

[Subpart PPPP: 63.4566]

4. 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, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office 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.

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.

5. Emission Limitation: Visible particulate emissions shall not exceed 5% opacity.

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

6. Emission Limitation: Emissions from natural gas usage in the incinerator and associated oven shall not exceed 0.197 lb NOx/hr.

   Applicable Compliance Method: Compliance with the allowable mass emission rate for NOx emissions from the natural gas usage in the incinerator and associated oven may be determined by multiplying an emission factor of 100 lb NOx/MMscf by the associated RTO's maximum hourly fuel usage of 0.0008 MMscf/hr and the associated oven's maximum hourly fuel usage of 0.00118 MMscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 7E.

7. Emission Limitation: Emissions from natural gas usage in the incinerator and associated oven shall not exceed 0.17 lb CO/hr .

   Applicable Compliance Method: Compliance with the allowable mass emission rate for CO emissions from the natural gas usage in the incinerator and associated oven may be determined by multiplying an emission factor of 84 lb CO/MMscf by the associated RTO's maximum hourly fuel usage of 0.0008 MMscf/hr and the associated oven's maximum hourly fuel usage of 0.00118 MMscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 10.

8. Emission Limitation: Emissions from natural gas usage in the incinerator and associated oven shall not exceed 0.0012 lb SO2/hr .

   Applicable Compliance Method: Compliance with the allowable mass emission rate for SO2 emissions from the natural gas usage in the incinerator and associated oven may be determined by multiplying an emission factor of 0.6 lb SO2/MMscf by the associated RTO's maximum hourly fuel usage of 0.0008 MMscf/hr and the associated oven's maximum hourly fuel usage of 0.00118 MMscf/hr.. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 6C.

9. Emission Limitation: Emissions from natural gas usage in the incinerator and associated oven shall not exceed 0.02 lb OC/hr .

   Applicable Compliance Method: Compliance with the allowable mass emission rate for OC emissions from the natural gas usage in the incinerator and associated oven may be determined by multiplying an emission factor of 11 lb OC/MMscf by the associated RTO's maximum hourly fuel usage of 0.0008 MMscf/hr and the associated oven's maximum hourly fuel usage of 0.00118 MMscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 18, 25 or 25A.

10. Emission Limitation: Emissions from natural gas usage in the incinerator and associated oven shall not exceed 0.015 lb PE/hr.

    Applicable Compliance Method: Compliance with the allowable mass emission rate for particulate emissions from the natural gas usage in the incinerator and associated oven may be determined by multiplying an emission factor of 7.6 lb PE/MMscf by the associated RTO's maximum hourly fuel usage of 0.0008 MMscf/hr and the associated oven's maximum hourly fuel usage of 0.00118 MMscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with the emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

11. Emission Limitation: Emissions from natural gas usage in the incinerator and associated oven shall not exceed 0.07 ton PE/yr; Emissions from natural gas usage in the incinerator and associated oven shall not exceed 0.005 ton SO2/yr; Emissions from natural gas usage in the incinerator and associated oven shall not exceed 0.1 ton OC/yr; Emissions from natural gas usage in the incinerator and associated oven shall not exceed 0.86 ton NOx/yr;

Emissions Unit ID: R009

Applicable Compliance Method: Compliance with the annual limitations shall be assumed as long as compliance with the hourly limitations is maintained (each annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

12. Emission Limitation: Organic Compound(OC) emissions shall not exceed 1.31 tons per year.

    Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in section A.III.2.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R009 - MD Line (plastics parts coating line) w/oven controlled by a PTE and RTO		Air Toxics Policy, see below.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions units R009, R010, R011 and R012 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: Cyclohexanone

TLV (ug/m3): 80,262

Maximum Hourly Emission Rate (lbs/hr): 2.78

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 1,265.6

MAGLC (ug/m3): 1,911

2. 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.).

3. 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.);

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.

4. The requirements specified above regarding Ohio EPA's "Air Toxic Policy" shall not apply to this emissions unit after the compliance date for this emissions unit in 40 CFR Part 63, Subpart PPPP (April 19, 2007).

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	
R010 - LH Roof line (plastics parts coating line) w/oven controlled by a PTE and RTO	OAC rule 3745-31-05(A)(3)	
		OAC rule 3745-17-07(A)
		OAC rule 3745-17-11(B)(1)
		OAC rule 3745-21-07(G)
		40 CFR Part 63, Subpart A
		40 CFR Part 63, Subpart PPPP

Applicable Emissions Limitations/Control Measures	
Organic Compound (OC) emissions shall not exceed 0.30 pound per hour and 1.31 tons per year. See sections A.I.2.a-c below. Emissions from natural gas usage in the incinerator and associated oven shall not exceed: 0.197 lb NOx/hr; 0.86 ton NOx/yr; 0.0012 lb SO2/hr; 0.005 ton SO2/yr; 0.17 lb CO/hr; 0.73 ton CO/yr; 0.015 lb PE/hr; 0.07 ton PE/yr; 0.02 lb OC/yr; and 0.1 ton OC/yr Visible particulate emissions (PE) shall not exceed 5% opacity. Compliance with this rule also includes compliance with the requirements of 40 CFR Part 63, Subpart PPPP and OAC rule 3745-17-11(B)(1).	The visible emission limitation specified in this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3). Particulate emissions from the application of coating shall not exceed 0.551 pound per hour. The organic compound (OC) emission limitations specified in this rule are less stringent than the OC emission limitations established pursuant to OAC rule 3745-31-05(A)(3). See section A.I.2.d below. See below.

2. Additional Terms and Conditions

2.a The permittee shall operate the particulate filtration system whenever this emissions unit is in operation.

2.b The PTE serving this emissions unit shall be installed and constructed in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M) .

2.c The permittee shall control OC emissions from this emissions unit through the use of a PTE and a Regenerative Thermal Oxidizer with a minimum control efficiency of 95%.

2.d This emissions unit is subject to the applicable provisions of the National Emission Standards for Hazardous Air Pollutants (NESHAP) as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63. The application and enforcement of these standards are delegated to Ohio EPA. The requirements of 40 CFR Part 63 are also federally enforceable.

2.e This emissions unit is subject to applicable sections of 40 CFR Part 63, Subpart A as denoted in 40 CFR Part 63, Subpart PPPP, Table 2.

II. Operational Restrictions

1. The minimum combustion temperature of the Regenerative Thermal Oxidizer shall be maintained at 1,400 degrees Fahrenheit or higher until initial emissions testing has been completed. Thereafter, the average temperature of the exhaust gases from the thermal incinerator, for any 3-hour block of time, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions units (R009 and R010) were in compliance.

2. The average combustion temperature in the firebox of the thermal oxidizer (or immediately downstream of the firebox before any substantial heat exchange) in any 3-hour block of time shall not be less than the average combustion temperature maintained during the most recent performance test that demonstrated compliance, and as recommended by the manufacturer until testing.

   [Subpart PPPP: 63.4492, 63.4568]

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

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and

recorder that measures and records the combustion temperature within the Regenerative Thermal Oxidizer 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.

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

a. A log of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

b. All 3-hour blocks of time during which the average combustion temperature within the Regenerative Thermal Oxidizer, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated that the emissions unit was in compliance.

c. Prior to the initial compliance demonstration, all 3-hour blocks of time during which the average combustion temperature within the Regenerative Thermal Oxidizer, when the emissions unit was in operation, was less than 1350 degrees

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

a. The name and identification number of each coating, as applied.

b. The OC content of each coating, as applied, in pounds per gallon.

c. The number of gallons of each coating employed.

d. The name and identification of each cleanup material employed.

e. The number of gallons of each cleanup material employed.

f. The OC content of each cleanup material, in pounds per gallon.

g. The total number of hours the emissions unit was operated.

h. The total uncontrolled OC emission rate from all coatings and cleanup materials, in pounds ([the summation of A.III.2.b X A.III.2.c for each coating] + [the summation of A.III.2.e X A.III.2.f for each cleanup material]).

i. The calculated, controlled OC emission rate for all coatings and cleanup materials, in pounds. The controlled OC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance. Prior to the initial compliance demonstration, the controlled OC emission rate shall be calculated based upon an assumed 95% control efficiency for the control equipment.

j. The average hourly controlled OC emission rate, in pounds per hour, i.e., A.III.2.i/A.III.2.g.

3. The permittee shall maintain and operate monitoring device(s) and a recorder which continuously measure and record the pressure differential from outside to inside the permanent total enclosure. The monitoring and recording device(s) shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

4. The permittee shall collect and record the following information for each operating day:

   a. operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit;

   b. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was less than 1350 degrees Fahrenheit; and

   c. all rolling, 1-hour blocks of time during which the average pressure differential between the permanent total enclosure and the outside area(s), when the emissions unit was in operation, was less than 0.007 inch of water column.

5. 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.

6. The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the firebox of the thermal oxidizer (or immediately downstream of the firebox before any substantial heat exchange) when the emissions unit is in operation. 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; and shall be capable of accurately measuring the temperature. The permittee shall collect and record the following information for each day:

a. all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal incinerator was less than the average combustion temperature maintained during the performance test that demonstrated compliance, or below the temperature recommended by the manufacturer until performance testing is completed; and

b. a log of the downtime for the capture (collection) system, thermal oxidizer, and/or monitoring equipment when the associated emissions unit was in operation.

[Subpart PPPP: 63.4530, 63.4568]

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

a. the name and identification number of each coating, thinner (includes any other additives and/or solvent blends), and cleanup/purge material, applied in the plastic parts coating operation(s), including information from the supplier or manufacturer, formulation data, and/or coating/material testing data;

b. the number of gallons or liters of each coating, thinner/additive, and cleanup/purge material employed;

c. the density of each coating, thinner/additive, and cleanup/purge material employed, in kg/liter or pounds/gallon, determined using ASTM Method D1475-98 or from information provided by the supplier or manufacturer of the material;

d. the mass fraction of organic Hazardous Air Pollutants (HAP) for each coating, thinner/additive, and cleanup/purge material applied during the month, as a weight fraction (e.g., lbs of HAP/lb of coating or kg HAP/kg coating), using one of the following methods:

i. Method 311 from 40 CFR Part 63, Appendix A;
ii. Method 24 from 40 CFR Part 60, Appendix A if all nonaqueous volatile matter is to be used for the mass fraction of HAP; or
iii. information from the supplier or manufacturer of the materials, where the mass fraction of organic HAP can be calculated from the density and the mass of HAP per gallon of each material (lbs HAP/gallon of material ÷ lbs/gallon of material, or calculated in kg/liter);

e. the mass fraction of coating solids (pounds of coating solids/pound of coating, or kg/kg) for each coating applied, determined using one of the following methods:

   i. Method 24 from 40 CFR Part 60, Appendix A
   ii. information from the supplier or manufacturer of the coatings, where the mass fraction of coating solids can be calculated from the density and the mass of solids per gallon of each material (lbs solids/gallon of coating ÷ lbs/gallon of coating, or calculated in kg/kg);

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

$$HAP = \sum_{i=1}^{r} (VOL_i)(D_i)(W_i)$$

where:

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

VOL_i is the volume of material "i" documented in (b) above, in gallons or liters;

D_i is the density of material "i" as documented in (c) above, in lb/gallon or kg/liter.

W_i is the mass fraction of organic HAP in material "i" as calculated in (d) above, in lb/lb or kg/kg.

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

$H_1 = HAP_c + HAP_t + HAP_{cu}$

H_1 is the total mass of organic HAP in the coatings (HAP_c), thinners/additives (HAP_t), and cleanup/purge materials (HAP_{cu}) applied each month in the coating operation "1", in pound or kg of HAP, the sum of the total mass of HAP calculated for each, above.

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

$$M_s = \sum_{h=1}^{m} (VOL_h)(D_h)(M_h)$$

where:

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

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

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

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

m is the number of coatings applied during the month.

h. if for the controlled coating operation, the permittee is performing liquid-liquid material balances each month, as required in this permit, the organic HAP emission reduction for the solvent recovered each month shall be calculated using a collection and recovery efficiency calculated as follows:

$$R_V = 100\ [\ M_{VR} / [\sum_{h=1}^{c} (VOL_h)(D_h)(W_h) + \sum_{j=1}^{t} (VOL_j)(D_j)(W_j) + \sum_{k=1}^{s} (VOL_k)(D_k)(W_k)]]$$

where:

R_V is the volatile organic matter collection and recovery efficiency of the solvent recovery system during the month, in percent;

M_{VR} is the mass of volatile organic matter recovered by the solvent recovery system during the month, in lb or kg.

VOL_h is the volume of coating "h", used in the coating operation controlled by the solvent recovery system during the month, documented in (b) above, in gallons or liters;

D_h is the density of coating "h" as documented in (c) above, in lb/gallon or kg/liter;

W_h is the mass fraction of volatile organic matter for coating "h", lbs of volatile organic matter/lb of coating (or kg/kg), calculated using Method 24 from 40 CFR Part 60, Appendix A or from information provided by the supplier or manufacturer of the coatings, which can be calculated from the density and mass of volatile organic matter per gallon of each coating (lbs volatile organic matter/gallon of coating ÷ lbs/gallon of coating, or calculated in kg/liter);

c is the number of coatings applied during the month.

VOL_j is the volume of thinner/additive "j" documented in (b) above, in gallons or liters.

D_j is the density of thinner/additive "j" as documented in (c) above, in lb/gallon or kg/liter.

W_j is the mass fraction of volatile organic matter for thinner/additive "j", lbs of volatile organic matter/lb of thinner (or kg/kg), calculated using Method 24 from 40 CFR Part 60, Appendix A or from information provided by the supplier or manufacturer of the thinners/additives, which can be calculated from the density and mass of volatile organic matter per gallon of each thinner/additive (lbs volatile organic matter/gallon of thinner ÷ lbs/gallon of thinner, or calculated in kg/liter).

t is the number of thinners/additives applied during the month.

VOL_k is the volume of cleanup/purge material "k" documented in (b) above, in gallons or liters.

D_k is the density of cleanup/purge material "k" as documented in (c) above, in lb/gallon or kg/liter.

W_k is the mass fraction of volatile organic matter for cleanup/purge material "k", lbs of volatile organic matter/lb of cleanup (or kg/kg), calculated using Method 24 from 40 CFR Part 60, Appendix A or from information provided by the supplier or manufacturer of the cleanup/purge, which can be calculated from the density and mass of volatile organic matter per gallon of each cleanup/purge material (lbs volatile organic matter/gallon of cleanup/purge ÷ lbs/gallon of

cleanup/purge, or calculated in kg/liter).

s is the number of cleanup/purge materials applied during the month.

i. the mass of organic HAP emission reduction for the coating operations controlled by the solvent recovery system using liquid-liquid balance, for the coatings, thinners/additives, and cleanup/purge materials recovered during the month, calculated as follows:

$HAP_{rec} = (HAP_c + HAP_t + HAP_{cu})\ (R_v/100)$

where:

HAP_{rec} is the mass of organic HAP emission reduction for the coating operation controlled by the solvent recovery system using a liquid-liquid material balance during the month, in lb or kg.

HAP_c is the total mass of organic HAP in the coatings used during the month in the coating operations controlled by the solvent recovery system, calculated as follows:

$$HAP_c = \sum_{h=1}^{r} (VOL_h)\ (D_h)\ (W_h)$$

where:

HAP_c is the total mass of organic HAP in the coatings used during the month in the coating operations controlled by the solvent recovery system, in lb or kg.

VOL_h is the volume of coating "h" used during the month in the coating operations controlled by the solvent recovery system, in gallons or liters.

D_h is the density of coating "h" used during the month in the coating operations controlled by the solvent recovery system, in lb/gallon or kg/liter;

W_h is the mass fraction of organic HAP in coating "h" used during the month in the coating operations controlled by the solvent recovery system, in lb/lb or kg/kg;

r is the number of coatings used in the coating operations controlled by the solvent recovery system during the month the volatile organic matter is recovered.

HAP_t is the total mass of organic HAP in the thinners/additives used during the month in the coating operations controlled by the solvent recovery system,

calculated as follows:

$$HAP_t = \sum_{j=1}^{q} (VOL_j)\ (D_j)\ (W_j)$$

where:

HAP_t is the total mass of organic HAP in the thinners/additives used during the month in the coating operations controlled by the solvent recovery system, in lb or kg.

VOL_j is the volume of thinner/additive "j" used during the month in the coating operations controlled by the solvent recovery system, in gallons or liters.

D_j is the density of thinner/additive "j" used during the month in the coating operations controlled by the solvent recovery system, in lb/gallon or kg/liter;

W_j is the mass fraction of organic HAP in thinner/additive "j" used during the month in the coating operations controlled by the solvent recovery system, in lb/lb or kg/kg;

q is the number of thinners/additives used in the coating operations controlled by the solvent recovery system during the month the volatile organic matter is recovered.

HAP_{cu} is the total mass of organic HAP in the cleanup/purge materials used during the month in the coating operations controlled by the solvent recovery system, calculated as follows:

$$HAP_{cu} = \sum_{k=1}^{s} (VOL_k)\ (D_k)\ (W_k)$$

where:

HAP_{cu} is the total mass of organic HAP in the cleanup/purge materials used during the month in the coating operations controlled by the solvent recovery system, in lb or kg.

VOL_k is the volume of cleanup/purge material "k" used during the month in the coating operations controlled by the solvent recovery system, in gallons or liters.

D_k is the density of cleanup/purge material "k" used during the month in the coating operations controlled by the solvent recovery system, in lb/gallon or kg/liter;

W_k is the mass fraction of organic HAP in cleanup/purge material "k" used during the month in the coating operations controlled by the solvent recovery system, in lb/lb or kg/kg;

s is the number of cleanup/purge materials used in the coating operations controlled by the solvent recovery system during the month the volatile organic mater is recovered.

R_V is the volatile organic matter collection and recovery efficiency of the solvent recovery system during the month, in percent, from (h) above;

j. the mass of organic HAP emission reduction for the month for the controlled coating operation using a capture system and add-on controls, calculated as follows:

$$HAP_{contr} = (A_c + B_t + C_{cu} - R_w - H_{dev})\ (CE/100 \times DRE/100)$$

where:

HAP_{contr} is the mass of organic HAP emission reduction for the controlled coating operations during each month, in lb or kg.

A_c is the total mass of organic HAP in the coatings used in the coating operations controlled by the add-on collection and control system during the month, calculated as follows:

$$A_c = \sum_{h=1}^{r} (VOL_h)\ (D_h)\ (W_h)$$

where:

A_c is the total mass of organic HAP in the coatings used in the coating operations controlled by the add-on collection and control system during the month, in lb or kg.

VOL_h is the volume of coating "h" used in the coating operations controlled by the add-on collection and control system during the month, in gallons or liters.

D_h is the density of coating "h" used in the coating operations controlled by the add-on collection and control system during the month, in lb/gallon or kg/liter;

W_h is the mass fraction of organic HAP in coating "h" used in the coating operations controlled by the add-on collection and control system during the month, in lb/lb or kg/kg;

r is the number of coatings used in the coating operations controlled by the add-on collection and control system during the month.

B_t is the total mass of organic HAP in the thinners/additives used in the coating operations controlled by the add-on collection and control system during the month, calculated as follows:

$$B_t = \sum_{j=1}^{q} (VOL_j)(D_j)(W_j)$$

where:

B_t is the total mass of organic HAP in the thinners/additives used in the coating operations controlled by the add-on collection and control system during the month, in lb or kg.

VOL_j is the volume of thinner/additive "j" used in the coating operations controlled by the add-on collection and control system during the month, in gallons or liters.

D_j is the density of thinner/additive "j" used in the coating operations controlled by the add-on collection and control system during the month, in lb/gallon or kg/liter;

W_j is the mass fraction of organic HAP in thinner/additive "j" used in the coating operations controlled by the add-on collection and control system during the month, in lb/lb or kg/kg;

q is the number of thinners/additives used in the coating operations controlled by the add-on collection and control system during the month.

C_{cu} is the total mass of organic HAP in the cleanup/purge materials used in the

coating operations controlled by the add-on collection and control system during the month, calculated as follows:

$$C_{cu} = \sum_{k=1}^{s} (VOL_k)(D_k)(W_k)$$

where:

C_{cu} is the total mass of organic HAP in the cleanup/purge materials used in the coating operations controlled by the add-on collection and control system during the month, in lb or kg.

VOL_k is the volume of cleanup/purge material "k" used in the coating operations controlled by the add-on collection and control system during the month, in gallons or liters.

D_k is the density of cleanup/purge material "k" used in the coating operations controlled by the add-on collection and control system during the month, in lb/gallon or kg/liter;

W_k is the mass fraction of organic HAP in cleanup/purge material "k" used in the coating operations controlled by the add-on collection and control system during the month, in lb/lb or kg/kg;

s is the number of cleanup/purge materials used in the coating operations controlled by the add-on collection and control system during the month.

R_w is the total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste TSDF for treatment or disposal during the compliance period, in lb or kg. (The value of zero can be assigned to R_w if the requirements for the allowance cannot be met, below*.)

H_{dev} is the total mass of organic HAP in the coatings, thinners/additives, and cleanup/purge materials applied during all periods of deviation during the month in the controlled coating operation(s), calculated as follows:

$$H_{dev} = \sum_{d=1}^{q} (VOL_d)(D_d)(W_d)$$

where:

H_{dev} is the total mass of organic HAP in the coatings, thinners/additives, and cleanup/purge materials applied during all periods of deviation during the month in the controlled coating operation(s), in lb or kg.

VOL_d is the volume of coating, thinner/additive, or cleanup/purge material "d" applied in the controlled coating operation(s) during periods of deviation during the month, in gallons or liters.

D_d is the density of coating, thinner/additive, or cleanup/purge material "d" applied in the controlled coating operation(s) during periods of deviation during the month, in lb/gallon or kg/liter;

W_d is the mass fraction of organic HAP in coating, thinner/additive, or cleanup/purge material "d" applied in the controlled coating operation(s) during periods of deviation during the month, in lb/lb or kg/kg;

q is the number of different coatings, thinners/additives, and cleanup/purge materials applied during periods of deviation during the month.

CE is the capture efficiency of the emission capture system vented to the add-on control device, in percent.

DRE is the organic HAP destruction or removal efficiency of the add-on control device, in percent.

* in order to use the allowance for R_w in the formula above, the total mass of organic HAP contained in the waste materials must be determined and the recovered amount documented, along with the records of the TSDF, the subparts under 40 CFR Parts 262, 264, 265, and 266 that apply to the TSDF, and the date the material was shipped. The methodology used to determine the amount of waste materials and total mass of organic HAP they contain must be documented. This must include the source of all data used in this determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations, as well as the month the allowance was applied in the compliance calculation.

k. the mass of organic HAP emissions for each month, calculated as follows:

$$HAP_T = [H_1 - \sum_{a=1}^{w}(HAP_{contr,\,a}) - \sum_{b=1}^{x}(HAP_{rec,\,b})$$

where:

HAP_T is the total mass of organic HAP emissions for the month, in lb or kg.

H_1 is the total mass of organic HAP emissions before add-on controls or recovery, from all coatings, thinners/additives, and cleanup/purge materials applied in the coating operation during the month, summed from the total mass of HAP calculated from all such materials, as required in (f) above, in lb or kg.

$HAP_{contr,\ a}$ is the total mass of organic HAP emission reduction for the month, for the add-on collection and control system for coating operation "a", calculated in (j) above.

$HAP_{rec,\ b}$ is the total mass of organic HAP emission reduction for the month, for the solvent recovery system using a liquid-liquid material balance, for coating operation "b", calculated as required in (i) above.

w is the number of controlled coating operations captured and vented to the add-on control system.

x is the number of coating operations controlled by a solvent recovery system using a liquid-liquid material balance.

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

$$HAP_{comply} = \sum_{y=1}^{12} (HAP_{T,\ y}) \ / \sum_{y=1}^{12} (M_{s,\ y})$$

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

$HAP_{T,\ y}$ is the total mass of organic HAP emissions from all materials used during month y, calculated in (k) above, in lb or kg.

$M_{s,\ y}$ is the total mass of coating solids used during month y, calculated in (g) above, in pounds or kg.

y is the identifier for the months;

m. continuous parameter monitoring system results and certification, and

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

8. The permittee shall also maintain the following records for the plastic parts coating line:

a. a copy of each notification, report, and supporting documentation submitted to comply with the NESHAP, including the results from each compliance demonstration and records establishing the operating limits during performance testing as required in 40 CFR 63.4492;

b. if using the predominant activity alternative under 40 CFR 63.4490(c)(1), records of the data and calculations used to determine the predominant activity; and

c. if using the facility specific emission limit alternative under 40 CFR 63.4490(c)(2), data used to calculate the facility-specific emission limit alternative.

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

[40 CFR 63.4530 & 40 CFR 63.4561]

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that include the following information:

a. all periods of time during which the permanent total enclosure was not maintained at or greater than the required differential pressure of 0.007 inches of water, when the emissions unit was in operation;

b. an identification of each day, during which the average hourly OC emissions from all coatings and cleanup materials exceeded 0.30 pound per hour, and the actual average hourly OC emissions for each such day;

c. an identification of all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent performance test that demonstrated the

emissions unit was in compliance, or below 1,350 degrees Fahrenheit until initial emissions testing has been completed; and

d. any record of downtime for the capture (collection) system, control device, and monitoring equipment, when the emissions unit was in operation.

These reports are due by the dates described in Part 1- General Terms and Conditions of this permit under section (A).

2. The permittee shall notify the Ohio EPA Central District Office in writing of any daily record showing that the particulate filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Central District Office within 30 days after the event occurs.

3. The permittee shall also submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

4. The permittee shall submit an initial notification report within 120 days after the emissions unit becomes subject to this subpart. The initial notification shall include the following information:

a. the name and address of the owner or operator;

b. the address, i.e., the physical location of the affected source;

c. an identification of the relevant standard (NESHAP) that is the basis of the notification and the compliance date;

d. a brief description of the nature, size, design, and method of operation of the source, including its operating design capacity and an identification of each point of emission for each hazardous air pollutant or a preliminary identification of each such point;

e. a statement of whether the affected source is a major source or an area source; and

f. the anticipated startup of the emissions unit following the issuance of the permit (or the date when construction or reconstruction was commenced if prior to the issuance of a permit).

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

[40 CFR 63.9(b)] & Subpart PPPP: 63.4510]

5. The permittee shall submit an initial notification of compliance status by 5/19/08 or 30 days following the end of the initial compliance period, which begins 4/19/07 and ends 4/19/08, which shall contain the following information:

   a. company name and address;

   b. statement by a responsible official certifying the truth, accuracy, and completeness of the content of the report (officials name, title, and signature);

   c. the date of the report and beginning and ending dates of the reporting period;

   d. identification of compliance option(s) for each coating operation, i.e., compliant material option; with or without add-on controls; and if solvent recovery is applied for an emissions reduction;

   e. statement of whether the affected source achieved the emission limitations for the initial compliance period;

   f. if there was a deviation during the initial compliance period, a description of the deviation and statement of the cause and the calculations of emissions used to determine non-compliance with the applicable limits;

   g. calculations and supporting documentation (information from supplier or manufacturer or summary of testing results) for the following:

      i. mass fraction of organic HAP for one coating, one thinner or additive, and one cleanup/purge material;

      ii. the mass fraction of coating solids for one coating;

      iii. density for one coating, one thinner or additive, and one cleanup/purge material; or if the "compliant coating option" is used, only the example coating density;

      iv. the amount of waste materials and mass of organic HAP contained in the waste materials for which a recovery credit is applied;

      v. the calculation of kg (lb) organic HAP emitted per kg (lb) coating solids used for the compliance option(s), or if using the "compliant coating

option", an example calculation of the organic HAP content for one coating;

vi. for the emissions rate without add-on controls:

(a) the calculation of the total mass of organic HAP emissions for each month;
(b) the calculation of the total mass of coating solids used each month; and
(c) the calculation of the 12-month organic HAP emission rate;

vii. for the emission rate with add-on controls:

(a) the calculation of the total mass of organic HAP emissions from the coatings, thinners/additives, and cleaning materials used each month;
(b) the calculation of the total mass of coating solids used each month;
(c) the calculation of the mass of organic HAP emission reduction for each month for the emission capture systems and add-on control devices;
(d) the calculation for the total mass of organic HAP emissions each month;
(e) the calculation of the 12-month organic HAP emission rate; and
(f) a statement of whether or not the work practice plan was developed and implemented;

viii. for the emission rate with add-on-controls (does do not apply to solvent recovery systems using a liquid-liquid material balance):

(a) a summary of the data and copies of the calculations supporting the determination that the each emissions capture system is a permanent total enclosure or a measurement of the emission capture system's efficiency, including the protocol followed;

(b) a summary of the results of each add-on control performance test; and

(c) a list of each emission capture system's add-on control device's operating limits and summary of the data used to calculate the limits.

h. a summary of the data and copies of the calculations supporting the determination that each emissions capture system is a permanent total enclosure or a measurement of the emission capture system's efficiency, including the protocol/procedures followed;

i. a summary of the results of any capture efficiency tests conducted and performance test conducted on each add-on control device;

j. a list of each emission capture system's add-on control device's operating limits and summary of the data used to calculate the limits; and

k. a statement of whether or not the work practice plan was developed and implemented.

[40 CFR 63.9(h)] & Subpart PPPP: 63.4510]

6. The permittee shall submit semiannual reports which shall be postmarked or delivered no later than July 31 or January 31 following the end of each semiannual reporting period (June 30 or December 31). The first semiannual compliance period shall begin the day after the end of the initial compliance period, as describes in this permit. The semiannual report shall containing the following information:

a. company name and address;

b. statement by a responsible official certifying the truth, accuracy, and completeness of the content of the report (officials name, title, and signature);

c. the date of the report and beginning and ending dates of the reporting period;

d. identification of compliance option(s) for each coating operation;

e. statement of whether the affected source achieved the emission limitations for the compliance period;

f. the calculation results for each rolling, 12-month organic HAP emission rate during the 6-month reporting period; and

g. if there were no deviations, a statement that there were no deviations from the emissions limitations during the reporting period; and if using add-on controls, a statement that there were no periods of time when the continuous parameter monitoring systems were out-of-control;

h. if there were any deviations during the compliance period, the report shall include the following information:

i. deviations from coating applications with add-on control shall include the following information:

(a) the beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit;

(b) any periods of time when emissions bypassed the add-on control device and were diverted to the atmosphere;

(c) the calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred, including the total mass of organic HAP emissions from coatings, thinners/additives, and cleaning materials used each month of deviation from the applicable limitation(s);

(d) if applicable, the calculation used to determine mass of organic HAP in waste materials;

(e) the calculation of the total mass of coating solids used each month, as required in this permit;

(f) the calculation of the mass of organic HAP emission reduction each month by emission capture systems and add-on control devices, as required in this permit;

(g) the calculation of the total mass of organic HAP emission rate each month of deviation and the 12-month emission rate, as required in this permit, in kg (or lb) organic HAP per liter (or gallon) of coating solids used;

(h) the date and time that each malfunction started and stopped;

(i) a brief description of the continuous parameter monitoring system (CPMS);

(j) the date of the latest CPMS certification or audit;

(k) the date, time, and duration that each CPMS was inoperative or was out-of-control (except for zero/low-level and high-level checks);

(l) the date and time period and duration of each deviation from any operating limit(s) contained in this permit, from Table 1 to this subpart;

(m) the date and time and duration of any bypass of the add-on control device and if each occurred during a period of startup, shutdown, or malfunction, or during another period;

(n) the total duration of deviation as a percent of the total source operating time, during the semiannual reporting period;

(o) a breakdown of the total duration of the deviations from the operating limits in Table 1 of this subpart and bypasses of the add-on control device during the semiannual reporting period into those that were due to startup, shutdown, control equipment problems, process problems, and other known or unknown causes;

(p) a summary of the total duration of CPMS downtime during the semiannual reporting period, and the total duration of the CPMS downtime as a percent of the total source operating time during the semiannual reporting period;

(q) a description of any changes in the CPMS, coating operation emission capture system, or add-on control device since the last semiannual reporting period;

(r) for each deviation from the work practice standards, a description of the deviation, the date and time period of the deviation, and the action taken to correct the deviation; and

(s) a statement of the cause of each deviation.

[Subpart PPPP: 63.4520(a)]

7. The permittee shall include startup, shutdown, and malfunction reports in the semiannual report if actions taken by the permittee during a startup, shutdown, and/or malfunction are consistent with the procedures specified in the facility startup, shutdown, and malfunction plan. The startup, shutdown, and/or malfunction report shall consist of a letter containing the name of the responsible official and his certification that all startup, shutdown, or malfunction events were conducted according to the plan.

If actions taken during any startup, shutdown, or malfunction were not consistent with the startup, shutdown, and malfunction plan, the permittee shall submit immediate startup, shutdown, and/or malfunction reports as follows:

a. within 2 working days after starting actions that are inconsistent with the plan, the permittee shall report these actions to the appropriate Ohio EPA District Office or local air agency, to be delivered by facsimile, telephone, or other means; and

b. unless alternative arrangements are made, within 7 working days after the end of the event, a letter shall be sent to the appropriate Ohio EPA District Office or local air agency and it shall contain:

i. the name, title, and signature of the responsible official who is certifying the accuracy of the report,
ii. an explanation of the circumstances of the event, i.e., the reasons for not following the startup, shutdown, and malfunction plan; and
iii. if any excess emissions and/or parameter monitoring exceedances have occurred.

[Subpart PPPP: 63.4500(c) & 63.6(e)(3)]

8. The permittee shall identify in the semiannual reports all 3-hour blocks of time, when the emissions unit was in operation, during which the average combustion temperature within the thermal incinerator was less than the average combustion temperature maintained and established during the most recent performance test that demonstrated compliance.

[Subpart PPPP: 63.4520]

V. Testing Requirements

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

a. Emission Limitations: Organic Compound (OC) emissions shall not exceed 0.30 pound per hour ; The permittee shall control OC emissions from this emissions unit through the use of a PTE and a Regenerative Thermal Oxidizer with a minimum control efficiency of 95%.

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

i. The emission testing shall be conducted within 60 days after achieving

the maximum production rate but no later than 180 days after initial startup of the emissions unit.

ii. The following test method(s) shall be employed to determine the overall control efficiency of the control equipment serving this emissions unit: 40 CFR Part 60, Appendix A, Methods 1 through 4, 25 or 25A, and 40 CFR Part 51, Appendix M, Method 204.

iii. The test(s) shall be conducted while this emissions unit and R009 are venting OC emissions to the Regenerative Thermal oxidizer. Each emissions unit shall be operated at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Central District Office.

The overall control efficiency of the control equipment serving this emissions unit shall be demonstrated based upon the results of the capture efficiency and control efficiency tests specified above. 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 Section A.V.1.a.ii of this permit and OAC rule 3745-21-10. 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.

2. 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 no later than 180 days following the compliance date specified in the Additional Terms and Conditions of this permit.

b. The emission testing shall be conducted to demonstrate compliance with the limit in 40 CFR Part 63, Subpart PPPP

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Method 1 of 1A of Appendix A to 40 CFR Part 60, to select sampling sites and velocity traverse points;

Method 2, 2A, 2C, 2D, 2F or 2G of Appendix A to 40 CFR Part 60, as appropriate, to measure gas volumetric flow rate;

Method 3, 3A, or 3B of Appendix A to 40 CFR Part 60, as appropriate, for gas analysis to determine dry molecular weight;

Method 4 of Appendix A to 40 CFR Part 60, to determine stack gas moisture;

Method 25 or 25A, to determine the total gaseous organic mass emissions as carbon at the inlet and outlet of each add-on control device simultaneously, using:

Method 25 if testing an oxidizer with expected carbon concentrations to exceed 50 ppm

Method 25A if testing an oxidizer with expected carbon concentrations to be 50 ppm or less, or if the control is not an oxidizer; and

Method 204 A through 204F (appropriate method) of Appendix M to 40 CFR Part 51 to determine the capture efficiency.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

e. The total gaseous organic emissions mass flow rates shall be determined for the inlet and the outlet of each add-on control device for each of 3 test runs.

f. The total gaseous organic emissions mass flow rate, in kg/hr or pounds/hour, shall be calculated as follows:

$M_f = Q_{sd}\ C_c\ (12)\ (0.0416)\ (10^{-6})$

where:

M_f is the total gaseous organic emissions mass flow rate, in kg/hr.

Q_{sd} is the volumetric flow rate of gases entering or exiting the add-on control device, as determine by Method 2, 2A, 2C, 2D, 2F or 2G, in dscm/hour

C_c is the concentration of organic compounds as carbon in the vent gas, as determined by Method 25 or 25A, in parts per million by volume on a dry basis

(ppmv).

0.0416 is the conversion factor for molar volume, Kg-moles per cubic meter (mol/m^3) @ 293 Kelvin and 760 mmHg.

g. For each test run the add-on control device organic emissions destruction or removal efficiency shall be calculated as follows:

$DRE = [(M_{fi} - M_{fo}) / M_{fi}] \times 100$

where

DRE is the organic emissions destruction or removal efficiency of the add-on control device, in percent

M_{fi} is the total gaseous organic emissions mass flow rate at the inlet(s) to the add-on control device(s), from the equation above, in kg/hour.

M_{fo} is the total gaseous organic emissions mass flow rate at the outlet(s) to the add-on control device(s), from the equation above, in kg/hour.

The emission destruction or removal efficiency of the add-on control device(s) shall be the average of the efficiencies determined in the three test runs.

3. Performance test results for emission capture systems and add-on control devices shall be submitted no later than 60 days after completion of the performance tests.

[Subpart PPPP: 63.4566]

4. 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, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office 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.

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.

5. Emission Limitation: Visible particulate emissions shall not exceed 5% opacity.

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

6. Emission Limitation: Emissions from natural gas usage in the incinerator and associated oven shall not exceed 0.197 lb NOx/hr.

   Applicable Compliance Method: Compliance with the allowable mass emission rate for NOx emissions from the natural gas usage in the incinerator and associated oven may be determined by multiplying an emission factor of 100 lb NOx/MMscf by the associated RTO's maximum hourly fuel usage of 0.0008 MMscf/hr and the associated oven's maximum hourly fuel usage of 0.00118 MMscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 7E.

7. Emission Limitation: Emissions from natural gas usage in the incinerator and associated oven shall not exceed 0.17 lb CO/hr .

   Applicable Compliance Method: Compliance with the allowable mass emission rate for CO emissions from the natural gas usage in the incinerator and associated oven may be determined by multiplying an emission factor of 84 lb CO/MMscf by the associated RTO's maximum hourly fuel usage of 0.0008 MMscf/hr and the associated oven's maximum hourly fuel usage of 0.00118 MMscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 10.

8. Emission Limitation: Emissions from natural gas usage in the incinerator and associated oven shall not exceed 0.0012 lb SO2/hr .

   Applicable Compliance Method: Compliance with the allowable mass emission rate for SO2 emissions from the natural gas usage in the incinerator and associated oven may

be determined by multiplying an emission factor of 0.6 lb SO2/MMscf by the associated RTO's maximum hourly fuel usage of 0.0008 MMscf/hr and the associated oven's maximum hourly fuel usage of 0.00118 MMscf/hr.. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 6C.

9. Emission Limitation: Emissions from natural gas usage in the incinerator and associated oven shall not exceed 0.02 lb OC/hr .

   Applicable Compliance Method: Compliance with the allowable mass emission rate for OC emissions from the natural gas usage in the incinerator and associated oven may be determined by multiplying an emission factor of 11 lb OC/MMscf by the associated RTO's maximum hourly fuel usage of 0.0008 MMscf/hr and the associated oven's maximum hourly fuel usage of 0.00118 MMscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 18, 25 or 25A.

10. Emission Limitation: Emissions from natural gas usage in the incinerator and associated oven shall not exceed 0.015 lb PE/hr.

    Applicable Compliance Method: Compliance with the allowable mass emission rate for particulate emissions from the natural gas usage in the incinerator and associated oven may be determined by multiplying an emission factor of 7.6 lb PE/MMscf by the associated RTO's maximum hourly fuel usage of 0.0008 MMscf/hr and the associated oven's maximum hourly fuel usage of 0.00118 MMscf/hr. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Tables 1.4-1 and 1.4-2(7/98). If required, the permittee shall demonstrate compliance with the emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

11. Emission Limitation: Emissions from natural gas usage in the incinerator and associated oven shall not exceed 0.07 ton PE/yr; Emissions from natural gas usage in the incinerator and associated oven shall not exceed 0.005 ton SO2/yr; Emissions from natural gas usage in the incinerator and associated oven shall not exceed 0.1 ton OC/yr; Emissions from natural gas usage in the incinerator and associated oven shall not exceed 0.86 ton NOx/yr;

Applicable Compliance Method: Compliance with the annual limitations shall be assumed as long as compliance with the hourly limitations is maintained (each annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

12. Emission Limitation: Organic Compound(OC) emissions shall not exceed 1.31 tons per year.

    Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in section A.III.2.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R010 - LH Roof line (plastics parts coating line) w/oven controlled by a PTE and RTO		Air Toxics Policy, see below.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions units R009, R010, R011 and R012 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: Cyclohexanone

TLV (ug/m3): 80,262

Maximum Hourly Emission Rate (lbs/hr): 2.78

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,265.6

MAGLC (ug/m3): 1,911

2. 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.).

3. 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.);

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.

4. The requirements specified above regarding Ohio EPA's "Air Toxic Policy" shall not apply to this emissions unit after the compliance date for this emissions unit in 40 CFR Part 63, Subpart PPPP (April 19, 2007).

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	
R011 - Paccar (plastics parts coating line) paint booth	OAC rule 3745-31-05(A)(3)	
		40 CFR Part 63, Subpart A
		40 CFR Part 63, Subpart PPPP
	OAC rule 3745-17-07(A)	
	OAC rule 3745-17-11(B)(1)	
	OAC rule 3745-21-07(G)(2)	

Emissions Unit ID: R011

Applicable Emissions Limitations/Control Measures	See section A.I.2.a below.
Organic compound (OC) emissions shall not exceed 5.5 pounds per hour and 40 lbs/day.	See below.
Organic compound (OC) emissions shall not exceed 7.3 tons per year.	
Visible particulate emissions (PE) shall not exceed 5% opacity.	
Compliance with this rule also includes compliance with the requirements of 40 CFR Part 63, Subpart PPPP and OAC rule 3745-17-11(B)(1).	
The visible emission limitation specified in this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3).	
Particulate emissions from the application of coating shall not exceed 0.551 pound per hour.	
The emission limitations specified by this rule are equivalent to or less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).	

2. Additional Terms and Conditions

2.a This emissions unit is subject to the applicable provisions of the National Emission Standards for Hazardous Air Pollutants (NESHAP) as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63. The application and enforcement of these standards are delegated to Ohio EPA. The requirements of 40 CFR Part 63 are also federally enforceable.

2.b This emissions unit is subject to applicable sections of 40 CFR Part 63, Subpart A as denoted in 40 CFR Part 63, Subpart PPPP, Table 2.

II. Operational Restrictions

1. The permittee shall not apply any coating in the coating operation with an organic HAP content greater than or equal to the limitation(s) contained in this NESHAP; and all the thinners, additives, and cleaning/purge materials applied shall not contain organic HAP. Any coating operation meeting these requirements, for each material applied, shall not be required to meet the operating limits or work practice standards of the applicable NESHAP.

   If every individual material used in the coating operations meets the emission limitation, compliance may be demonstrated by documentation of the name and organic HAP content of each material used. If any individual material used within the group exceeds this emission limit/HAP content, the mass average organic HAP content must be calculated.

   [Subpart PPPP: 63.4491(a), 63.4541, 63.4542]

2. The permittee shall develop and implement a work practice plan to minimize organic HAP emissions from the storage, mixing, and conveying of coatings, thinners, and cleaning/purge materials used in the controlled coating operations and the wastes materials generated by the coating operations. The plan shall specify practices and procedures to ensure that, at a minimum, the following elements are addressed:

   a. requirements to maintain all organic HAP-containing coatings, thinners, solvent blends, additives, cleanup/purge materials, and waste materials in closed containers;

   b. procedures to minimize spills of organic-HAP containing coatings, thinners, solvent blends, additives, cleanup/purge materials, and waste materials;

c. requirements to move organic-HAP containing coatings, thinners, solvent blends, additives, cleanup/purge materials, and waste materials from one location to another in closed containers or pipes;

d. requirements to keep mixing vessels which contain organic-HAP containing coatings, thinners, solvent blends, or other additives closed, except when adding, removing, or manually mixing the contents where a non-automated/non-mechanical mixing system is used; and

e. procedures to minimize emissions of organic-HAP during cleaning of storage, mixing, and conveying equipment.

[Subpart PPPP: 63.4493]

3. The permittee shall operate the dry filtration system whenever this emissions unit is in operation, to control particulate emissions.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for emissions unit R011:

   a. The company identification for each material employed.

   b. The number of gallons of each material employed.

   c. The OC content of each material employed, in pounds per gallon.

   d. The total number of hours the emissions unit was in operation.

   e. the total OC emission rate, in pounds per day.

   f. the average hourly OC emission rate for all materials employed.

2. The permittee shall maintain a copy of each notification and report submitted to comply with the requirements of 40 CFR Part 63, Subpart PPPP.

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

a. the name and identification number of each coating, thinner (includes any other additives and/or solvent blends), and cleanup/purge material, applied in the plastic parts coating operation(s), including at a minimum:

   i. information from the supplier or manufacturer,
   ii. formulation data and/or coating/material testing data,
   iii. all data, documentation, and/or calculations needed to demonstrate that each coating meets the limits contained in 40 CFR 63.4490 and that each thinner, additive, and cleanup material applied in the plastic parts coating operations contained no organic HAP*;

b. the number of gallons or liters of each coating, thinner/additive, and cleanup/purge material employed;

c. the density of each coating, thinner/additive, and cleanup/purge material employed, in kg/liter or pounds/gallon, determined using ASTM Method D1475-98 or from information provided by the supplier or manufacturer of the material;

d. the mass fraction of organic Hazardous Air Pollutants (HAP) for each coating, thinner/additive, and cleanup/purge material applied during the month, as a weight fraction (e.g., lbs of HAP/lb of coating or kg HAP/kg coating), using one of the following methods:

   i. Method 311 from 40 CFR Part 63, Appendix A;
   ii. Method 24 from 40 CFR Part 60, Appendix A if all nonaqueous volatile matter is to be used for the mass fraction of HAP; or
   iii. information from the supplier or manufacturer of the materials, where the mass fraction of organic HAP can be calculated from the density and the mass of HAP per gallon of each material (lbs HAP/gallon of material ÷ lbs/gallon of material, or calculated in kg/liter);

e. the mass fraction of coating solids (pounds of coating solids/pound of coating, or kg/kg) for each coating applied, determined using one of the following methods:

   i. Method 24 from 40 CFR Part 60, Appendix A
   ii. information from the supplier or manufacturer of the coatings, where the mass fraction of coating solids can be calculated from the density and the mass of solids per gallon of each material (lbs solids/gallon of coating ÷ lbs/gallon of coating, or calculated in kg/kg);

f. the organic HAP content of each coating, in kg of organic HAP emitted per kg of coating solids used or pound of organic HAP emitted per pound of coating solids used, calculated as follows for each coating applied in the plastic parts coating operations using the compliant material option:

$H_c = W_c / S_c$

where:

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

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

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

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

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

4. The permittee shall also maintain the following records for the plastic parts coating line:

a. a copy of each notification, report, and supporting documentation submitted to comply with the NESHAP;

b. if using the predominant activity alternative under 40 CFR 63.4490(c)(1), records of the data and calculations used to determine the predominant activity; and

c. if using the facility specific emission limit alternative under 40 CFR 63.4490(c)(2), data used to calculate the facility-specific emission limit alternative.

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

[40 CFR 63.4530 & 40 CFR 63.4541]

5. The permittee shall maintain records to demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable limitation contained in this NESHAP and permit; and that no thinner, additive, and/or cleanup/purge material used in the coating operations contains organic HAP at 1.0% or more by mass and no HAP defined by the Occupational Safety and Health Administration (OSHA) as a carcinogen, in 29 CFR 1910.1200(d)(4), equal to or greater than 0.1% by mass.

   [Subpart PPPP: 63.4491(a), 63.4541, 63.4542]

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

   a. An identification of each day during which the average hourly OC emissions exceeded 5.5 lbs/hr, and the actual average hourly OC emissions for each such day.

   b. An identification of each day during which the average hourly OC emissions exceeded 40 lbs/day, and the actual OC emissions for each such day.

   These reports are due by the dates described in Part 1- General Terms and Conditions of this permit under section (A).

2. The permittee shall notify Ohio EPA, Central District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to Ohio EPA, Central District Office within 45 days after the exceedance occurs.

3. The permittee shall submit an initial notification report within 120 days after the emissions unit becomes subject to this subpart. The initial notification shall include the following information:

   a. the name and address of the owner or operator;

   b. the address, i.e., the physical location of the affected source;

   c. an identification of the relevant standard (NESHAP) that is the basis of the notification and the compliance date;

   d. a brief description of the nature, size, design, and method of operation of the source, including its operating design capacity and an identification of each point of emission for each hazardous air pollutant or a preliminary identification of

each such point;

e. a statement of whether the affected source is a major source or an area source; and

f. the anticipated startup of the emissions unit following the issuance of the permit (or the date when construction or reconstruction was commenced if prior to the issuance of a permit).

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

[40 CFR 63.9(b) & Subpart PPPP: 63.4510]

4. The permittee shall submit an initial notification of compliance status by 5/19/08 or 30 days following the end of the initial compliance period, which begins 4/19/07 and ends 4/19/08, which shall containing the following information:

a. company name and address;

b. statement by a responsible official certifying the truth, accuracy, and completeness of the content of the report (officials name, title, and signature);

c. the date of the report and beginning and ending dates of the reporting period;

d. identification of compliance option(s) for each coating operation, i.e., compliant material option; with or without add-on controls; and if solvent recovery is applied for an emissions reduction;

e. statement of whether the affected source achieved the emission limitations for the initial compliance period;

f. if there was a deviation during the initial compliance period, a description of the deviation and statement of the cause and the calculations of emissions used to determine non-compliance with the applicable limits;

g. calculations and supporting documentation (information from supplier or manufacturer or summary of testing results) for the following:

i. mass fraction of organic HAP for one coating, one thinner or additive, and one cleanup/purge material;

ii. the mass fraction of coating solids for one coating;

iii. density for one coating, one thinner or additive, and one cleanup/purge material; or if the "compliant coating option" is used, only the example coating density;

iv. the amount of waste materials and mass of organic HAP contained in the waste materials for which a recovery credit is applied;

v. the calculation of kg (lb) organic HAP emitted per kg (lb) coating solids used for the compliance option(s), or if using the "compliant coating option", an example calculation of the organic HAP content for one coating;

vi. for the emissions rate without add-on controls:

(a) the calculation of the total mass of organic HAP emissions for each month;
(b) the calculation of the total mass of coating solids used each month; and
(c) the calculation of the 12-month organic HAP emission rate;

vii. for the emission rate with add-on controls:

(a) the calculation of the total mass of organic HAP emissions from the coatings, thinners/additives, and cleaning materials used each month;
(b) the calculation of the total mass of coating solids used each month;
(c) the calculation of the mass of organic HAP emission reduction for each month for the emission capture systems and add-on control devices;
(d) the calculation for the total mass of organic HAP emissions each month;
(e) the calculation of the 12-month organic HAP emission rate; and
(f) a statement of whether or not the work practice plan was developed and implemented;

viii. for the emission rate with add-on-controls (does do not apply to solvent recovery systems using a liquid-liquid material balance):

(a) a summary of the data and copies of the calculations supporting the determination that the each emissions capture system is a permanent total enclosure or a measurement of the emission

capture system's efficiency, including the protocol followed;

(b) a summary of the results of each add-on control performance test; and

(c) a list of each emission capture system's add-on control device's operating limits and summary of the data used to calculate the limits.

[40 CFR 63.9(h) & Subpart PPPP: 63.4510]

5. The permittee shall submit semiannual reports which shall be postmarked or delivered no later than July 31 or January 31 following the end of each semiannual reporting period (June 30 or December 31). The first semiannual compliance period shall begin the day after the end of the initial compliance period, as describes in this permit. The semiannual report shall containing the following information:

a. company name and address;

b. statement by a responsible official certifying the truth, accuracy, and completeness of the content of the report (officials name, title, and signature);

c. the date of the report and beginning and ending dates of the reporting period;

d. identification of compliance option(s) for each coating operation;

e. statement of whether the affected source achieved the emission limitations for the compliance period;

f. the calculation results for each rolling, 12-month organic HAP emission rate during the 6-month reporting period; and

g. if there were no deviations, a statement that there were no deviations from the emissions limitations during the reporting period; and if using add-on controls, a statement that there were no periods of time when the continuous parameter monitoring systems were out-of-control;

h. if there were any deviations during the compliance period, the report shall include the following information:

i. if using the "compliant material option" the report shall include:

(a) an identification of each coating used that deviated from the applicable emission limit, and each thinner/additive, and cleaning material used that contained organic HAP and the dates and times each was used;

(b) the calculation of the organic HAP content for each coating that deviated from the applicable limit, in kg (lb) of organic HAP emitted per kg (lb) of coating solids used;

(c) the determination of the mass fraction of organic HAP for each thinner, additive, and cleaning material used during the time of deviation;

(d) a statement of the cause of each deviation

ii. deviations from coating applications without add-on control shall include the following information:

(a) the beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit;

(b) the calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred, including emissions from coatings, thinners/additives, and cleaning materials used each month of deviation from the applicable limitation(s);

(c) if applicable, the calculation used to determine mass of organic HAP in waste materials; and

(d) a statement of the cause of each deviation

[Subpart PPPP: 63.4520(a)]

6. The permittee shall include startup, shutdown, and malfunction reports in the semiannual report if actions taken by the permittee during a startup, shutdown, and/or malfunction are consistent with the procedures specified in the facility startup,

shutdown, and malfunction plan. The startup, shutdown, and/or malfunction report shall consist of a letter containing the name of the responsible official and his certification that all startup, shutdown, or malfunction events were conducted according to the plan.

If actions taken during any startup, shutdown, or malfunction were not consistent with the startup, shutdown, and malfunction plan, the permittee shall submit immediate startup, shutdown, and/or malfunction reports as follows:

a. within 2 working days after starting actions that are inconsistent with the plan, the permittee shall report these actions to the appropriate Ohio EPA District Office or local air agency, to be delivered by facsimile, telephone, or other means; and

b. unless alternative arrangements are made, within 7 working days after the end of the event, a letter shall be sent to the appropriate Ohio EPA District Office or local air agency and it shall contain:

   i. the name, title, and signature of the responsible official who is certifying the accuracy of the report,
   ii. an explanation of the circumstances of the event, i.e., the reasons for not following the startup, shutdown, and malfunction plan; and
   iii. if any excess emissions and/or parameter monitoring exceedances have occurred.

[Subpart PPPP: 63.4500(c) & 63.6(e)(3)]

7. The permittee shall identify in the semiannual reports any period of time where a coating was applied that exceeded the organic HAP content limitation contained in this NESHAP and/or a thinner, additive, and/or cleaning/purge material was applied that contained organic HAP as defined in this permit. The report shall document the date and duration of the exceedance, as well as the mass average organic HAP content calculation for the compliance period during which the exceedance occurred.

[Subpart PPPP: 63.4491(a), 63.4541, 63.4542]

V. Testing Requirements

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

   a. Emission Limitation: Organic compound (OC) emissions shall not exceed 5.5 lbs/hr and 40 lbs/day .

      Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section A.III.1

b. Emission Limitation: Organic compound (OC) emissions shall not exceed 7.3 tons per year.

Applicable Compliance Method: Compliance shall be based upon a summation of the daily emission rates recorded in A.III.1.e above for the calendar year

c. Emission Limitation: Particulate emissions (PE) shall not exceed 0.551 lb/hr.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

d. Emission Limitation: Visible particulate emissions from the stack shall not exceed 5%.

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

2. USEPA Method 24 shall be used to determine the VOC contents for the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R011 - Paccar (plastics parts coating line) paint booth		Air Toxics Policy, see below.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions units R009, R010, R011 and R012 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: Cyclohexanone

   TLV (ug/m3): 80,262

   Maximum Hourly Emission Rate (lbs/hr): 2.78

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 1,265.6

MAGLC (ug/m3): 1,911

2. 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.).

3. 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.);

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.

4. The requirements specified above regarding Ohio EPA's "Air Toxic Policy" shall not apply to this emissions unit after the compliance date for this emissions unit in 40 CFR Part 63, Subpart PPPP (April 19, 2007).

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	
R012 - SS/RH (plastics parts coating line) paint booth	OAC rule 3745-31-05(A)(3)	
		40 CFR Part 63, Subpart A
		40 CFR Part 63, Subpart PPPP
	OAC rule 3745-17-07(A)	
	OAC rule 3745-17-11(B)(1)	
	OAC rule 3745-21-07(G)(2)	

Applicable Emissions Limitations/Control Measures	
	less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
Organic compound (OC) emissions shall not exceed 5.5 pounds per hour and 40 lbs/day.	See section A.I.2.a below. See below.
Organic compound (OC) emissions shall not exceed 7.3 tons per year.	
Visible particulate emissions (PE) shall not exceed 5% opacity.	
Compliance with this rule also includes compliance with the requirements of 40 CFR Part 63, Subpart PPPP and OAC rule 3745-17-11(B)(1).	
The visible emission limitation specified in this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3).	
Particulate emissions from the application of coating shall not exceed 0.551 pound per hour.	
The emission limitations specified by this rule are equivalent to or	

2. Additional Terms and Conditions

2.a This emissions unit is subject to the applicable provisions of the National Emission Standards for Hazardous Air Pollutants (NESHAP) as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63. The application and enforcement of these standards are delegated to Ohio EPA. The requirements of 40 CFR Part 63 are also federally enforceable.

2.b This emissions unit is subject to applicable sections of 40 CFR Part 63, Subpart A as denoted in 40 CFR Part 63, Subpart PPPP, Table 2.

II. Operational Restrictions

1. The permittee shall not apply any coating in the coating operation with an organic HAP content greater than or equal to the limitation(s) contained in this NESHAP; and all the thinners, additives, and cleaning/purge materials applied shall not contain organic HAP. Any coating operation meeting these requirements, for each material applied, shall not be required to meet the operating limits or work practice standards of the applicable NESHAP.

   If every individual material used in the coating operations meets the emission limitation, compliance may be demonstrated by documentation of the name and organic HAP content of each material used. If any individual material used within the group exceeds this emission limit/HAP content, the mass average organic HAP content must be calculated.

   [Subpart PPPP: 63.4491(a), 63.4541, 63.4542]

2. The permittee shall develop and implement a work practice plan to minimize organic HAP emissions from the storage, mixing, and conveying of coatings, thinners, and cleaning/purge materials used in the controlled coating operations and the wastes materials generated by the coating operations. The plan shall specify practices and procedures to ensure that, at a minimum, the following elements are addressed:

   a. requirements to maintain all organic HAP-containing coatings, thinners, solvent blends, additives, cleanup/purge materials, and waste materials in closed containers;

   b. procedures to minimize spills of organic-HAP containing coatings, thinners, solvent blends, additives, cleanup/purge materials, and waste materials;

c. requirements to move organic-HAP containing coatings, thinners, solvent blends, additives, cleanup/purge materials, and waste materials from one location to another in closed containers or pipes;

d. requirements to keep mixing vessels which contain organic-HAP containing coatings, thinners, solvent blends, or other additives closed, except when adding, removing, or manually mixing the contents where a non-automated/non-mechanical mixing system is used; and

e. procedures to minimize emissions of organic-HAP during cleaning of storage, mixing, and conveying equipment.

[Subpart PPPP: 63.4493]

3. The permittee shall operate the dry filtration system whenever this emissions unit is in operation, to control particulate emissions.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for emissions unit R012:

   a. The company identification for each material employed.

   b. The number of gallons of each material employed.

   c. The OC content of each material employed, in pounds per gallon.

   d. The total number of hours the emissions unit was in operation.

   e. the total OC emission rate, in pounds per day.

   f. the average hourly OC emission rate for all materials employed.

2. The permittee shall maintain a copy of each notification and report submitted to comply with the requirements of 40 CFR Part 63, Subpart PPPP.

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

   a. the name and identification number of each coating, thinner (includes any other additives and/or solvent blends), and cleanup/purge material, applied in the plastic parts coating operation(s), including at a minimum:

      i. information from the supplier or manufacturer,

ii. formulation data and/or coating/material testing data,
iii. all data, documentation, and/or calculations needed to demonstrate that each coating meets the limits contained in 40 CFR 63.4490 and that each thinner, additive, and cleanup material applied in the plastic parts coating operations contained no organic HAP*;

b. the number of gallons or liters of each coating, thinner/additive, and cleanup/purge material employed;

c. the density of each coating, thinner/additive, and cleanup/purge material employed, in kg/liter or pounds/gallon, determined using ASTM Method D1475-98 or from information provided by the supplier or manufacturer of the material;

d. the mass fraction of organic Hazardous Air Pollutants (HAP) for each coating, thinner/additive, and cleanup/purge material applied during the month, as a weight fraction (e.g., lbs of HAP/lb of coating or kg HAP/kg coating), using one of the following methods:

i. Method 311 from 40 CFR Part 63, Appendix A;
ii. Method 24 from 40 CFR Part 60, Appendix A if all nonaqueous volatile matter is to be used for the mass fraction of HAP; or
iii. information from the supplier or manufacturer of the materials, where the mass fraction of organic HAP can be calculated from the density and the mass of HAP per gallon of each material (lbs HAP/gallon of material ÷ lbs/gallon of material, or calculated in kg/liter);

e. the mass fraction of coating solids (pounds of coating solids/pound of coating, or kg/kg) for each coating applied, determined using one of the following methods:

i. Method 24 from 40 CFR Part 60, Appendix A
ii. information from the supplier or manufacturer of the coatings, where the mass fraction of coating solids can be calculated from the density and the mass of solids per gallon of each material (lbs solids/gallon of coating ÷ lbs/gallon of coating, or calculated in kg/kg);

f. the organic HAP content of each coating, in kg of organic HAP emitted per kg of coating solids used or pound of organic HAP emitted per pound of coating solids used, calculated as follows for each coating applied in the plastic parts coating operations using the compliant material option:

$H_c = W_c / S_c$

where:

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

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

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

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

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

4. The permittee shall also maintain the following records for the plastic parts coating line:

a. a copy of each notification, report, and supporting documentation submitted to comply with the NESHAP;

b. if using the predominant activity alternative under 40 CFR 63.4490(c)(1), records of the data and calculations used to determine the predominant activity; and

c. if using the facility specific emission limit alternative under 40 CFR 63.4490(c)(2), data used to calculate the facility-specific emission limit alternative.

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

[40 CFR 63.4530 & 40 CFR 63.4541]

5. The permittee shall maintain records to demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable limitation contained in this NESHAP and permit; and that no thinner, additive, and/or cleanup/purge material used in the coating operations contains organic HAP at 1.0% or

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

[Subpart PPPP: 63.4491(a), 63.4541, 63.4542]

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

   a. An identification of each day during which the average hourly OC emissions exceeded 5.5 lbs/hr, and the actual average hourly OC emissions for each such day.

   b. An identification of each day during which the average hourly OC emissions exceeded 40 lbs/day, and the actual OC emissions for each such day.

   These reports are due by the dates described in Part 1- General Terms and Conditions of this permit under section (A).

2. The permittee shall notify Ohio EPA, Central District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to Ohio EPA, Central District Office within 45 days after the exceedance occurs.

3. The permittee shall submit an initial notification report within 120 days after the emissions unit becomes subject to this subpart. The initial notification shall include the following information:

   a. the name and address of the owner or operator;

   b. the address, i.e., the physical location of the affected source;

   c. an identification of the relevant standard (NESHAP) that is the basis of the notification and the compliance date;

   d. a brief description of the nature, size, design, and method of operation of the source, including its operating design capacity and an identification of each point of emission for each hazardous air pollutant or a preliminary identification of

each such point;

e. a statement of whether the affected source is a major source or an area source; and

f. the anticipated startup of the emissions unit following the issuance of the permit (or the date when construction or reconstruction was commenced if prior to the issuance of a permit).

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

[40 CFR 63.9(b) & Subpart PPPP: 63.4510]

4. The permittee shall submit an initial notification of compliance status by 5/19/08 or 30 days following the end of the initial compliance period, which begins 4/19/07 and ends 4/19/08, which shall containing the following information:

a. company name and address;

b. statement by a responsible official certifying the truth, accuracy, and completeness of the content of the report (officials name, title, and signature);

c. the date of the report and beginning and ending dates of the reporting period;

d. identification of compliance option(s) for each coating operation, i.e., compliant material option; with or without add-on controls; and if solvent recovery is applied for an emissions reduction;

e. statement of whether the affected source achieved the emission limitations for the initial compliance period;

f. if there was a deviation during the initial compliance period, a description of the deviation and statement of the cause and the calculations of emissions used to determine non-compliance with the applicable limits;

g. calculations and supporting documentation (information from supplier or manufacturer or summary of testing results) for the following:

i. mass fraction of organic HAP for one coating, one thinner or additive, and one cleanup/purge material;

ii. the mass fraction of coating solids for one coating;

iii. density for one coating, one thinner or additive, and one cleanup/purge

material; or if the "compliant coating option" is used, only the example coating density;

iv. the amount of waste materials and mass of organic HAP contained in the waste materials for which a recovery credit is applied;

v. the calculation of kg (lb) organic HAP emitted per kg (lb) coating solids used for the compliance option(s), or if using the "compliant coating option", an example calculation of the organic HAP content for one coating;

vi. for the emissions rate without add-on controls:

(a) the calculation of the total mass of organic HAP emissions for each month;
(b) the calculation of the total mass of coating solids used each month; and
(c) the calculation of the 12-month organic HAP emission rate;

vii. for the emission rate with add-on controls:

(a) the calculation of the total mass of organic HAP emissions from the coatings, thinners/additives, and cleaning materials used each month;
(b) the calculation of the total mass of coating solids used each month;
(c) the calculation of the mass of organic HAP emission reduction for each month for the emission capture systems and add-on control devices;
(d) the calculation for the total mass of organic HAP emissions each month;
(e) the calculation of the 12-month organic HAP emission rate; and
(f) a statement of whether or not the work practice plan was developed and implemented;

viii. for the emission rate with add-on-controls (does do not apply to solvent recovery systems using a liquid-liquid material balance):

(a) a summary of the data and copies of the calculations supporting the determination that the each emissions capture system is a permanent total enclosure or a measurement of the emission

capture system's efficiency, including the protocol followed;

(b) a summary of the results of each add-on control performance test; and

(c) a list of each emission capture system's add-on control device's operating limits and summary of the data used to calculate the limits.

[40 CFR 63.9(h) & Subpart PPPP: 63.4510]

5. The permittee shall submit semiannual reports which shall be postmarked or delivered no later than July 31 or January 31 following the end of each semiannual reporting period (June 30 or December 31). The first semiannual compliance period shall begin the day after the end of the initial compliance period, as describes in this permit. The semiannual report shall containing the following information:

a. company name and address;

b. statement by a responsible official certifying the truth, accuracy, and completeness of the content of the report (officials name, title, and signature);

c. the date of the report and beginning and ending dates of the reporting period;

d. identification of compliance option(s) for each coating operation;

e. statement of whether the affected source achieved the emission limitations for the compliance period;

f. the calculation results for each rolling, 12-month organic HAP emission rate during the 6-month reporting period; and

g. if there were no deviations, a statement that there were no deviations from the emissions limitations during the reporting period; and if using add-on controls, a statement that there were no periods of time when the continuous parameter monitoring systems were out-of-control;

h. if there were any deviations during the compliance period, the report shall include the following information:

i. if using the "compliant material option" the report shall include:

(a) an identification of each coating used that deviated from the applicable emission limit, and each thinner/additive, and cleaning material used that contained organic HAP and the dates and times each was used;

(b) the calculation of the organic HAP content for each coating that deviated from the applicable limit, in kg (lb) of organic HAP emitted per kg (lb) of coating solids used;

(c) the determination of the mass fraction of organic HAP for each thinner, additive, and cleaning material used during the time of deviation;

(d) a statement of the cause of each deviation

ii. deviations from coating applications without add-on control shall include the following information:

(a) the beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit;

(b) the calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred, including emissions from coatings, thinners/additives, and cleaning materials used each month of deviation from the applicable limitation(s);

(c) if applicable, the calculation used to determine mass of organic HAP in waste materials; and

(d) a statement of the cause of each deviation.

[Subpart PPPP: 63.4520(a)]

6. The permittee shall include startup, shutdown, and malfunction reports in the semiannual report if actions taken by the permittee during a startup, shutdown, and/or malfunction are consistent with the procedures specified in the facility startup, shutdown, and malfunction plan. The startup, shutdown, and/or malfunction report shall consist of a letter containing the name of the responsible official and his certification that all startup, shutdown, or malfunction events were conducted according to the plan.

If actions taken during any startup, shutdown, or malfunction were not consistent with

the startup, shutdown, and malfunction plan, the permittee shall submit immediate startup, shutdown, and/or malfunction reports as follows:

a. within 2 working days after starting actions that are inconsistent with the plan, the permittee shall report these actions to the appropriate Ohio EPA District Office or local air agency, to be delivered by facsimile, telephone, or other means; and

b. unless alternative arrangements are made, within 7 working days after the end of the event, a letter shall be sent to the appropriate Ohio EPA District Office or local air agency and it shall contain:

i. the name, title, and signature of the responsible official who is certifying the accuracy of the report,
ii. an explanation of the circumstances of the event, i.e., the reasons for not following the startup, shutdown, and malfunction plan; and
iii. if any excess emissions and/or parameter monitoring exceedances have occurred.

[Subpart PPPP: 63.4500(c) & 63.6(e)(3)]

7. The permittee shall identify in the semiannual reports any period of time where a coating was applied that exceeded the organic HAP content limitation contained in this NESHAP and/or a thinner, additive, and/or cleaning/purge material was applied that containing organic HAP as defined in this permit. The report shall document the date and duration of the exceedance, as well as the mass average organic HAP content calculation for the compliance period during which the exceedance occurred.

[Subpart PPPP: 63.4491(a), 63.4541, 63.4542]

V. Testing Requirements

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

a. Emission Limitation: Organic compound (OC) emissions shall not exceed 5.5 lbs/hr and 40 lbs/day .

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements as specified in Section A.III.1

b. Emission Limitation: Organic compound (OC) emissions shall not exceed 7.3 tons per year.

Applicable Compliance Method: Compliance shall be based upon a summation of the daily emission rates recorded in A.III.1.e above for the calendar year

c. Emission Limitation: Particulate emissions (PE) shall not exceed 0.551 lb/hr.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

d. Emission Limitation: Visible particulate emissions from the stack shall not exceed 5%.

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

2. USEPA Method 24 shall be used to determine the VOC contents for the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R012 - SS/RH (plastics parts coating line) paint booth		Air Toxics Policy, see below.

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions units R009, R010, R011 and R012 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):

Emissions Unit ID: R012

Pollutant: Cyclohexanone

TLV (ug/m3): 80,262

Maximum Hourly Emission Rate (lbs/hr): 2.78

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 1,265.6

MAGLC (ug/m3): 1,911

2. 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.).

3. 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.);

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.

4. The requirements specified above regarding Ohio EPA's "Air Toxic Policy" shall not apply to this emissions unit after the compliance date for this emissions unit in 40 CFR Part 63, Subpart PPPP (April 19, 2007).

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None