



State of Ohio Environmental Protection Agency

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Columbus, Ohio 43215

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Columbus, OH 43216-1049

11/9/2009

Certified Mail

David Osmun  
Bridgestone APM Co.- AVD Plant  
235 Commerce Way  
Upper Sandusky, OH 43351

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 0388010047  
Permit Number: P0105318  
Permit Type: Administrative Modification  
County: Wyandot

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

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Please complete a survey at [www.epa.ohio.gov/dapc/permitsurvey.aspx](http://www.epa.ohio.gov/dapc/permitsurvey.aspx) and give us feedback on your permitting experience. We value your opinion.

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

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

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

Sincerely,

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

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

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





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

**FINAL**

**Air Pollution Permit-to-Install  
for  
Bridgestone APM Co.- AVD Plant**

Facility ID: 0388010047  
Permit Number: P0105318  
Permit Type: Administrative Modification  
Issued: 11/9/2009  
Effective: 11/9/2009





State of Ohio Environmental Protection Agency  
 Division of Air Pollution Control

**Air Pollution Permit-to-Install**  
 for  
 Bridgestone APM Co.- AVD Plant

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State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install**  
**Permit Number:** P0105318  
**Facility ID:** 0388010047  
**Effective Date:** 11/9/2009

## Authorization

Facility ID: 0388010047  
Facility Description: Bonded rubber to metal anti-vibration parts for the automotive industry  
Application Number(s): M0000544  
Permit Number: P0105318  
Permit Description: Administrative modification to PTI 03-17207, issued February 5, 2008 to correct applicable emission limitations and RTO temperature monitoring requirements in accordance with 40 CFR Part 63 Subpart Mmmm.  
Permit Type: Administrative Modification  
Permit Fee: \$200.00  
Issue Date: 11/9/2009  
Effective Date: 11/9/2009

This document constitutes issuance to:

Bridgestone APM Co.- AVD Plant  
235 Commerce Way  
Upper Sandusky, OH 43351

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski  
Director



## Authorization (continued)

Permit Number: P0105318  
Permit Description: Administrative modification to PTI 03-17207, issued February 5, 2008 to correct applicable emission limitations and RTO temperature monitoring requirements in accordance with 40 CFR Part 63 Subpart Mmmm.

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

**Group Name: Honda Bond Lines**

<b>Emissions Unit ID:</b>	<b>R003</b>
Company Equipment ID:	Roll Coat No. 3
Superseded Permit Number:	03-17207
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>R004</b>
Company Equipment ID:	Bond Line No. 4
Superseded Permit Number:	03-17207
General Permit Category and Type:	Not Applicable

**Group Name: Various Coating Lines (Group A)**

<b>Emissions Unit ID:</b>	<b>K004</b>
Company Equipment ID:	Index #1
Superseded Permit Number:	03-17207
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K005</b>
Company Equipment ID:	Index #2
Superseded Permit Number:	03-17207
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K006</b>
Company Equipment ID:	Robot Line #1
Superseded Permit Number:	03-17207
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K007</b>
Company Equipment ID:	Chain-On-Edge #1
Superseded Permit Number:	03-17207
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K008</b>
Company Equipment ID:	Chain-On-Edge #2
Superseded Permit Number:	03-17207
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K009</b>
Company Equipment ID:	Robot Line #2
Superseded Permit Number:	03-17207
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K010</b>
Company Equipment ID:	Roll-Coater
Superseded Permit Number:	03-17207
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K011</b>
Company Equipment ID:	Flange Index Bonding Line
Superseded Permit Number:	03-17207
General Permit Category and Type:	Not Applicable



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**Final Permit-to-Install**  
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**Group Name: Various Coating Lines (Group B)**

<b>Emissions Unit ID:</b>	<b>K012</b>
Company Equipment ID:	Tumble & Spray Bond Line
Superseded Permit Number:	03-17207
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K013</b>
Company Equipment ID:	Flange Index #2 Bonding Line
Superseded Permit Number:	03-17207
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install**  
**Permit Number:** P0105318  
**Facility ID:** 0388010047  
**Effective Date:** 11/9/2009

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



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

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

**2. Severability Clause**

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

**3. General Requirements**

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



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

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

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



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

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

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

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

## 5. Scheduled Maintenance/Malfunction Reporting

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

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

## 6. Compliance Requirements

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

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

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



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

## **7. Best Available Technology**

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

## **8. Air Pollution Nuisance**

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

## **9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northwest District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted



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

## **10. Applicability**

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

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

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



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

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

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

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

## **13. Construction Compliance Certification**

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

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

## **14. Public Disclosure**

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

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

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

## **16. Fees**

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



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**17. Permit Transfers**

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

**18. Risk Management Plans**

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

**19. Title IV Provisions**

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



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**Final Permit-to-Install**  
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**Effective Date:** 11/9/2009

## **B. Facility-Wide Terms and Conditions**



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only: None.
  - a) The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart Mmmm, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products: K004-K013. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Ohio EPA, Northwest District Office.
  - b) The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart Pppp, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products: R003 and R004. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Ohio EPA, Northwest District Office.
  - c) This facility is applicable to both the Surface Coating of Plastic Parts and Products MACT (Subpart Pppp) and the Surface Coating of Miscellaneous Metal Parts and Products (Subpart Mmmm). In accordance with the rule, the company chooses to have all applicable surface coating operations comply with the emissions limits set forth in Subpart Mmmm since the coating of miscellaneous metal parts is the predominant activity at the facility. Therefore, emissions units R003 and R004 will comply with 40 CFR Part 63, Subpart Mmmm.



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



**1. Emissions Unit Group - Honda Bond Lines: R003, R004,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
R003	roll coat machine no.3 roll with RTO
R004	Honda bondline no.4 vented to a regenerative thermal oxidizer

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) b)(1)h; d)(8); d)(9); d)(10); d)(11) and e)(2)b.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<u>For R003 and R004 individually:</u> See b)(2)a.  0.33 lb organic compounds (OC)/hr; 1.45 tons OC/year from coating and cleanup operations  39.86 tons OC year from coating and cleanup from emissions units K004-K013 and R003-R004 combined [See b)(2)b.]
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	None [See b)(2)c.]
c.	OAC rule 3745-21-07(G)(2)	See b)(2)d. and b)(2)e.
d.	OAC rule 3745-21-07(M)	See b)(2)f.
e.	OAC rule 3745-17-11(B)	<u>For R003 and R004 individually</u> 0.551 lb particulate emissions (PE)/hr  See b)(2)g.
f.	OAC rule 3745-17-11(C)	See b)(2)h. and c)(1).
g.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed twenty percent opacity, as a six-minute average except as provided by rule.  See b)(2)g.
h.	OAC rule 3745-114-01 ORC 3704.03(F)(4)(b)	See d)(8) through d)(11).
i.	40 CFR Part 63, Subpart M (See 40 CFR Part 63.3880 et seq.)	<u>63.3890(a)(4):</u>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	[In accordance with 40 CFR 63.3881, this emissions unit is a rubber-to-metal coating source at an existing miscellaneous metal parts and products surface coating facility.]	0.81 kg (6.8 lb) organic hazardous air pollutants (HAP) emitted per liter (gal) coating solids used during each 12-month compliance period  See section B.1.c. – FACILITY – WIDE TERMS AND CONDITIONS  See b)(2)j.
j.	40 CFR Part 63, Subpart PPPP (See 40 CFR Part 63.4480 et seq.)	63.4481(e)  See b)(2)i.  See section B.1.b. – FACILITY – WIDE TERMS AND CONDITIONS
k.	40 CFR 63.1-15 (40 CFR 63.3901)	Table 2 to Subpart MMMM of 40 CFR Part 63- Applicability to Subpart MMMM shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

- a. Permit to Install 03-17207 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)
  - i. use of a regenerative thermal oxidizer achieving a minimum destruction efficiency of 95% (100% capture)

The potential to emit for emissions units R003 and R004 individually, is 1.45 tons OC/year and was determined by multiplying the maximum OC content of 6.54 lbs/gal by a maximum coating usage rate of 0.9 gal/hr, applying a 95% control efficiency, then multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.
- b. A voluntarily request for a grouped annual OC emission limitation of 39.86 tons is being established for K004-K013 and R003-R004 combined to ease the monitoring and recordkeeping requirements for these emissions units.
- c. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE from this air contaminant source since the calculated annual emission rate for PE is less than ten tons per year taking into account the federally enforceable rule limit of 0.551 pounds PE per hour from each coating booth operation under OAC rule 3745-17-11(B).
- d. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the



U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision:

None

The emission limitations and control requirements from the amended 21-07 rule, and the associated operational restrictions and the monitoring, record keeping, and reporting requirements contained in this permit, shall become federally enforceable on the date the U.S. EPA approves the revised OAC rule 3745-21-07 as a revision to the Ohio State Implementation Plan. The following terms shall become federally enforceable after U.S. EPA approves the rule revision:

None.

- e. The emission limitation established pursuant to this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- f. These emissions units meet the conditions contained in OAC rule 3745-21-07(M)(3)(c)(iii), which are more stringent than the requirements of OAC rule 3745-21-07(M)(2). Therefore, OAC rules 3745-21-07(M)(3)(a) and 3745-21-07(M)(3)(b) are not considered applicable.
- g. The requirements to comply with this rule shall terminate on the date the U.S. EPA approves the requirements based on OAC rule 3745-17-11(C) as a revision to the Ohio SIP for particulate emissions.
- h. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.
- i. This facility is applicable to both the Surface Coating of Plastic Parts and Products MACT (Subpart PPPP) and the Surface Coating of Miscellaneous Metal Parts and Products MACT (Subpart MMMM). In accordance with the rule, the company chooses to have all applicable surface coating operations comply with the emissions limits set forth in Subpart MMMM since the coating of miscellaneous metal parts is the predominant activity at the facility.
- j. The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart MMMM, including the following sections:
  - 63.3900- General requirements for complying with this subpart
  - 63.3901- Applicable General Provisions



c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (2) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.
- (3) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart M, including the following sections:
  - 63.3892(a) through (c)- Applicable operating limits
  - 63.3893(a) through (c)- Work practice standards

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each coating and cleanup material employed each month for emissions units K004-K013 and R003-R004 combined:
  - a. the name and identification of each coating and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed;
  - c. the OC content of each coating and cleanup material employed, as applied, in pounds per gallon;
  - d. the total controlled OC emission rate for all the coatings and cleanup materials, in lbs per month, calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance  $\{[\text{summation of (d)(1)b.} \times \text{(d)(1)c. (for all coatings and cleanup materials employed)}] \times [1 - \text{over all control efficiency (from the most recent emission testing that demonstrated the emissions unit was in compliance)}]\}$ ; and
  - e. the annual year-to-date organic compound emissions (sum of d)(1)d. for each month to date from January to December).

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material] x solvent density).



- (2) The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 63, Subpart M, including the following sections:  
  
63.3930(a) through (k)
- (3) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (4) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (5) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (6) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

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

- (7) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- (8) The permit-to-install application for these emissions unit(s), K004-K013, R002 and R003 was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit



application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
  - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
  - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "24" hours per day and "7" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: toluene

TLV (mg/m3): 188.4

Maximum Hourly Emission Rate (lbs/hr): 9.43

Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 287.3

MAGLC (ug/m3): 4486



The permittee, has demonstrated that emissions of toluene, from emissions unit(s) K004-K013, R002 and R003, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

- (9) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, 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 new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
  - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" 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 a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTI prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (10) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
  - b. the Maximum Acceptable Ground Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
  - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground level concentration that demonstrated the emissions unit(s) to



be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

- d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

- (11) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

- (1) The permittee shall submit annual reports that summarize the total annual actual OC emissions from K004-K013 and R003-R004 combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation; and
  - b. any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground level concentration; or if no changes to the emissions, emissions unit(s), or the exhaust stack have been made, a statement to this effect.
  - c. If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31, April 30, July 31, and October 31, and shall cover the previous calendar quarters unless an alternative schedule has been established and approved by the Director (Ohio EPA, Northwest District Office).

- (3) The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District Office or local air agency as are required pursuant to 40 CFR Part 63, Subpart M, per the following sections:

63.3910(a) through (c) and 63.3920(a) through (c)



f) Testing Requirements

- (1) The permittee shall conduct, or have conducted, emission testing for this emissions unit as required pursuant to 40 CFR Part 63, Subpart M, per the following sections:

63.3960- Timeframe for conducting performance tests and other initial compliance demonstrations

63.3961- How to demonstrate initial compliance

63.3963 through 63.3967- Demonstrating continuous compliance with add-on control equipment

- (2) Compliance with the emission limitation in Section b)(1) of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:  
0.33 lb OC/hour from R003 and R004, individually

Applicable Compliance Method:

The lb/hr limit represents each emissions unit's potential to emit and was developed by multiplying the maximum hourly coating usage (0.9 gallons/hr), the maximum coating OC content (6.54 lbs/gallon coating) and applying a 95% overall control efficiency (100% capture, 95% destruction efficiency).

Compliant emissions tests were conducted on August 23, 2007 for RTO #1 and on December 8, 2005 for RTO #2. If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR, Part 60 Appendix A, Methods 1-4 and 18, 25 or 25 A.

- b. Emission Limitation:  
1.45 tons OC/year from R003 and R004, individually

Applicable Compliance Method:

The annual limitation of 1.45 tons OC/year was established by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

- c. Emission Limitation:  
39.86 tons OC/year from coating and cleanup operations from K004-K013 and R003-R004 combined

Applicable Compliance Method:

Compliance with the 39.86 tons OC/yr combined emission limitation above shall be based upon the record keeping requirements specified in section d)(1) of this permit.

- d. Emission Limitation:  
0.551 pound PE per hour from R003 and R004, individually



Applicable Compliance Method:

To determine the actual worst case PE rate (E), the following equation shall be used for each individual coating operations:

$E = \text{PE rate (lbs/hr)}$

$E = \text{maximum coating solids usage rate, in pounds per hour (1-TE) x (1-CE)}$

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with the emission limitation above pursuant to OAC rule 3745-17-03(B)(10).

e. Emission Limitation:

Visible particulate emissions (PE) shall not exceed twenty percent opacity, as a six-minute average except as provided by rule.

Applicable Compliance Method:

If required, compliance with the visible emissions limitation above shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

g) Miscellaneous Requirements

- (1) None.



**2. Emissions Unit Group - Various Coating Lines (Group A): K004, K005, K006, K007, K008, K009, K010, K011**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
K004	Index coating line no. 1 vented to a regenerative thermal oxidizer
K005	Index coating line no.2 vented to a regenerative thermal oxidizer
K006	Robot coating operation vented to a regenerative thermal oxidizer
K007	Chain on edge coating line no.1 vented to a regenerative thermal oxidizer
K008	Chain on edge coating line no. 2 vented to a regenerative thermal oxidizer
K009	Robot coating line no.2 vented to a regenerative thermal oxidizer
K010	Roll coat line no.1 vented to regenerative thermal oxidizer
K011	Flange index bond line no. 1 vented to regenerative thermal oxidizer

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
- (1) b)(1)f.; d)(9); d)(10); d)(11); d)(12); and e)(2)b.
- b) Applicable Emissions Limitations and/or Control Requirements
- (1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p><u>For K004 and K005 individually:</u>            See b)(2)a.            0.98 lb organic compounds (OC)/hr; 4.29 tons OC/year from coating and cleanup operations</p> <p><u>For K006:</u>            See b)(2)a.            0.72 lb OC/hour, 3.15 tons OC/year from coating and cleanup operations</p> <p><u>For K007 and K008 individually:</u>            See b)(2)a.            1.14 lbs OC/hour, 4.99 tons OC/year from coating and cleanup operations</p> <p><u>For K009:</u>            See b)(2)a.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>0.82 lb OC/hour, 3.59 tons OC/year from coating and cleanup operations</p> <p><u>For K010:</u> See b)(2)a.</p> <p>0.43 lb OC/hour, 1.88 tons OC/year from coating and cleanup operations</p> <p><u>For K011:</u> See b)(2)a.</p> <p>0.49 lb OC/hour, 2.15 tons OC/year from coating and cleanup operations</p> <p>39.86 tons OC year from coating and cleanup from emissions units K004-K013 and R003-R004 combined [See b)(2)b.]</p>
b.	OAC rule 3745-21-09(B)(6)	See b)(2)c.
c.	OAC rule 3745-17-11(B)	<p><u>For K004-K011 individually</u> 0.551 lb particulate emissions (PE)/hr</p> <p>See b)(2)d.</p>
d.	OAC rule 3745-17-07(A)	<p>Visible particulate emissions (PE) shall not exceed twenty percent opacity, as a six-minute average except as provided by rule.</p> <p>See b)(2)d.</p>
e.	OAC rule 3745-17-11(C)	See b)(2)e. and c)(1).
f.	OAC rule 3745-114-01 ORC 3704.03(F)(4)(b)	See d)(9) through d)(12).
g.	<p>40 CFR Part 63, Subpart M (See 40 CFR Part 63.3880 et seq.)</p> <p>[In accordance with 40 CFR 63.3881, this emissions unit is a rubber-to-metal coating source at an existing miscellaneous metal parts and products surface coating facility.]</p>	<p><u>63.3890(a)(4):</u></p> <p>0.81 kg (6.8 lb) organic hazardous air pollutants (HAP) emitted per liter (gal) coating solids used during each 12-month compliance period</p> <p>See section B.1.a. – FACILITY – WIDE TERMS AND CONDITIONS</p> <p>See b)(2)g.</p>
h.	40 CFR 63.1-15 (40 CFR 63.3901)	Table 2 to Subpart M of 40 CFR Part 63- Applicability to Subpart M shows which parts of the General Provisions in 40 CFR 63.1-15 apply.



(2) Additional Terms and Conditions

- a. Best Available Technology (BAT) control requirements for emissions units K004-K011 have been determined to be the use of a regenerative thermal oxidizer for OC control and the use of dry filtration for PE control. The regenerative thermal oxidizer shall meet a minimum destruction efficiency of 95% (100% capture).

The permittee has committed to reclaim 100% of all cleanup material used resulting in no emissions from cleanup operations [see c)(3)]. Cleanup solvents are only used in the enclosed booths when coating operations have been discontinued. The cleanup operation is a closed loop system using covered paint pots and covered pails to recover the used solvents.

- b. A voluntarily request for a grouped annual OC emission limitation of 39.86 tons is being established for K004-K013 and R003-R004 combined to ease the monitoring and recordkeeping requirements for these emissions units.
- c. In lieu of complying with the pounds of VOC per gallon of solids limitation contained in paragraph (U) of OAC rule 3745-21-09, the permittee has elected to demonstrate that the capture and control equipment meet the requirements contained in OAC rule 3745-21-09(B)(6). The capture and control requirements specified in OAC rule 3745-21-09(B)(6) are less stringent than the capture and control requirements established pursuant to OAC rule 3745-31-05(A)(3).
- d. The requirements to comply with this rule shall terminate on the date the U.S. EPA approves the requirements based on OAC rule 3745-17-11(C) as a revision to the Ohio SIP for particulate emissions.
- e. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.
- f. The lb/hr and ton/year OC emissions limitations for K004-K011 represent each emissions unit's potential to emit based on the legal and practical enforceability of the control requirements contained in this permit. For purposes of federal enforceability, emission limitations on OC effectively limit emissions of volatile organic compounds (VOC).
- g. The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart M, including the following sections:
  - 63.3900- General requirements for complying with this subpart
  - 63.3901- Applicable General Provisions



c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this/these emissions unit(s) is/are in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (2) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.
- (3) The permittee shall recover 100% of all cleanup material employed in emissions units K004-K011.
- (4) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart M, including the following sections:
  - 63.3892(a) through (c)- Applicable operating limits
  - 63.3893(a) through (c)- Work practice standards

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each coating and cleanup material employed each month for emissions units K004-K013 and R003-R004 combined:
  - a. the name and identification of each coating and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed;
  - c. the OC content of each coating and cleanup material employed, as applied, in pounds per gallon;
  - d. the total controlled OC emission rate for all the coatings and cleanup materials, in lbs per month, calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance  $\{[\text{summation of d}(1)\text{c.} \times \text{d}(1)\text{d. (for all coatings and cleanup materials employed)}] \times [(1 - \text{over all control efficiency (from the most recent emission testing that demonstrated the emissions unit was in compliance)}] \}$ ; and
  - e. the annual year-to-date organic compound emissions (sum of d)(1)e. for each month to date from January to December).

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

$$\text{OC emissions from cleanup operations} = (\text{total gallons of cleanup material used} \times \text{solvent density of cleanup material}) - (\text{total gallons cleanup material sent off-site})$$



for disposal or reclamation [minus solids content of said material] x solvent density).

- (2) The permittee shall maintain records that document any cleanup operations which were not performed as described in b)(2)a. and/or reclaimed as specified in d)(1)e. above.
- (3) The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 63, Subpart M, including the following sections:  
63.3930(a) through (k)
- (4) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (5) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (6) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (7) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

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

- (8) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.



(9) The permit-to-install application for these emissions unit(s), K004-K013, R002 and R003 was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
  - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
  - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "24" hours per day and "7" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: toluene

TLV (mg/m3): 188.4

Maximum Hourly Emission Rate (lbs/hr): 9.43



Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 287.3

MAGLC (ug/m3): 4486

The permittee, has demonstrated that emissions of toluene, from emissions unit(s) K004-K013, R002 and R003, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

- (10) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, 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 new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
  - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" 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 a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTI prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (11) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);



- b. the Maximum Acceptable Ground Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
  - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
  - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- (12) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- e) Reporting Requirements
- (1) The permittee shall submit annual reports that summarize the total annual actual OC emissions from K004-K013 and R003-R004 combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
  - (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
    - a. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation; and
    - b. any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground level concentration; or if no changes to the emissions, emissions unit(s), or the exhaust stack have been made, a statement to this effect.
- The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31, April 30, July 31, and October 31, and shall cover the previous calendar quarters unless an alternative schedule has been established and approved by the Director (Ohio EPA, Northwest District Office).
- (3) The permittee shall notify the Director (Ohio EPA, Northwest District Office) in writing of any daily record showing that cleanup operations which were not performed as described in b)(2)a. and/or reclaimed as specified in c)(3) above. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days after the exceedance occurs.



- (4) The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District Office or local air agency as are required pursuant to 40 CFR Part 63, Subpart M, per the following sections:

63.3910(a) through (c) and 63.3920(a) through (c)

f) Testing Requirements

- (1) The permittee shall conduct, or have conducted, emission testing for this emissions unit as required pursuant to 40 CFR Part 63, Subpart M, per the following sections:

63.3960- Timeframe for conducting performance tests and other initial compliance demonstrations

63.3961- How to demonstrate initial compliance

63.3963 through 63.3967- Demonstrating continuous compliance with add-on control equipment

- (2) Compliance with the emission limitation in Section b)(1) of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation:

0.98 lb OC/hour from K004 and K005 coating and cleanup operations, individually

Applicable Compliance Method:

The lb/hr limit represents each emissions unit's potential to emit and was developed by multiplying the maximum hourly coating usage (3.0 gallons/hr), the maximum coating OC content (6.54 lbs/gallon coating) and applying a 95% overall control efficiency (100% capture, 95% destruction efficiency).

Compliant emissions tests were conducted on August 23, 2007 for RTO #1 and on December 8, 2005 for RTO #2. If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR, Part 60 Appendix A, Methods 1-4 and 18, 25 or 25 A.

b. Emission Limitation:

4.29 tons OC/year from K004 and K005 coating and cleanup operations, individually

Applicable Compliance Method:

The annual limitation of 4.29 tons OC/year was established by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

c. Emission Limitation:

0.72 lb OC/hour from K006 coating and cleanup operations



Applicable Compliance Method:

The lb/hr limit represents the emissions unit's potential to emit and was developed by multiplying the maximum hourly coating usage (2.20 gallons/hr), the maximum coating OC content (6.54 lbs/gallon coating) and applying a 95% overall control efficiency (100% capture, 95% destruction efficiency).

Compliant emissions tests were conducted on August 23, 2007 for RTO #1 and on December 8, 2005 for RTO #2. If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR, Part 60 Appendix A, Methods 1-4 and 18, 25 or 25 A.

d. Emission Limitation:

3.15 tons OC/year from K006 coating and cleanup operations

Applicable Compliance Method:

The annual limitation of 3.15 tons OC/year was established by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

e. Emission Limitation:

1.14 lbs OC/hour from K007 and K008 coating and cleanup operations, individually

Applicable Compliance Method:

The lb/hr limit represents each emissions unit's potential to emit and was developed by multiplying the maximum hourly coating usage (3.50 gallons/hr), the maximum coating OC content (6.54 lbs/gallon coating) and applying a 95% overall control efficiency (100% capture, 95% destruction efficiency).

Compliant emissions tests were conducted on August 23, 2007 for RTO #1 and on December 8, 2005 for RTO #2. If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR, Part 60 Appendix A, Methods 1-4 and 18, 25 or 25 A.

f. Emission Limitation:

4.99 tons OC/year from K007 and K008 coating and cleanup operations, individually

Applicable Compliance Method:

The annual limitation of 4.99 tons OC/year was established by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

g. Emission Limitation:

0.82 lb OC/hour from K009 coating and cleanup operations

Applicable Compliance Method:

The lb/hr limit represents the emissions unit's potential to emit and was developed by multiplying the maximum hourly coating usage (2.50 gallons/hr),



the maximum coating OC content (6.54 lbs/gallon coating) and applying a 95% overall control efficiency (100% capture, 95% destruction efficiency).

Compliant emissions tests were conducted on August 23, 2007 for RTO #1 and on December 8, 2005 for RTO #2. If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR, Part 60 Appendix A, Methods 1-4 and 18, 25 or 25 A.

- h. Emission Limitation:  
3.59 tons OC/year from K009 coating and cleanup operations

Applicable Compliance Method:  
The annual limitation of 3.59 tons OC/year was established by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

- i. Emission Limitation:  
0.43 lb OC/hour from K010 coating and cleanup operations

Applicable Compliance Method:  
The lb/hr limit represents the emissions unit's potential to emit and was developed by multiplying the maximum hourly coating usage (1.30 gallons/hr), the maximum coating OC content (6.54 lbs/gallon coating) and applying a 95% overall control efficiency (100% capture, 95% destruction efficiency).

Compliant emissions tests were conducted on August 23, 2007 for RTO #1 and on December 8, 2005 for RTO #2. If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR, Part 60 Appendix A, Methods 1-4 and 18, 25 or 25 A.

- j. Emission Limitation:  
1.88 tons OC/year from K010 coating and cleanup operations

Applicable Compliance Method:  
The annual limitation of 1.88 tons OC/year was established by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

- k. Emission Limitation:  
0.49 lb OC/hour from K011 coating and cleanup operations

Applicable Compliance Method:  
The lb/hr limit represents the emissions unit's potential to emit and was developed by multiplying the maximum hourly coating usage (1.50 gallons/hr), the maximum coating OC content (6.54 lbs/gallon coating) and applying a 95% overall control efficiency (100% capture, 95% destruction efficiency).

Compliant emissions tests were conducted on August 23, 2007 for RTO #1 and on December 8, 2005 for RTO #2. If required, the permittee shall demonstrate



compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR, Part 60 Appendix A, Methods 1-4 and 18, 25 or 25 A.

- l. Emission Limitation:  
2.15 tons OC/year from K011 coating and cleanup operations

Applicable Compliance Method:  
The annual limitation of 2.15 tons OC/year was established by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

- m. Emission Limitation:  
39.86 tons OC/year from coating and cleanup operations from K004-K013 and R003-R004 combined

Applicable Compliance Method:  
Compliance with the 39.86 tons OC/yr combined emission limitation above shall be based upon the record keeping requirements specified in section d)(1) of this permit.

- n. Emission Limitation:  
0.551 pound PE per hour for K004-K011 individually

Applicable Compliance Method:  
To determine the actual worst case PE rate (E), the following equation shall be used for each individual coating operations:

$$E = \text{PE rate (lbs/hr)}$$

$$E = \text{maximum coating solids usage rate, in pounds per hour (1-TE) x (1-CE)}$$

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with the emission limitation above pursuant to OAC rule 3745-17-03(B)(10).

- o. Emission Limitation:  
Visible particulate emissions (PE) shall not exceed twenty percent opacity, as a six-minute average except as provided by rule.

Applicable Compliance Method:  
If required, compliance with the visible emissions limitation above shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

- g) Miscellaneous Requirements

- (1) None.



**3. Emissions Unit Group - Various Coating Lines (Group B): K012, K013,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
K012	Tumble and spray bond line vented to a regenerative thermal oxidizer
K013	Flange index bond line no. 2 vented to a regenerative thermal oxidizer

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) b)(1)g; d)(9); d)(10); d)(11); d)(12); and e)(2)b.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p><u>For K012 individually:</u> See b)(2)a. and b)(2)b.  0.92 lb organic compounds (OC)/hr; 4.03 tons OC/year from coating and cleanup operations</p> <p><u>For K013 individually:</u> See b)(2)a. and b)(2)b.  0.49 lb organic compounds (OC)/hr; 2.15 tons OC/year from coating and cleanup operations</p> <p>39.86 tons OC year from coating and cleanup from emissions units K004-K013 and R003-R004 combined [See b)(2)c.]</p>
b.	OAC rule 3745-31-05(A)(3)(b)	See b)(2)d.
c.	OAC rule 3745-21-09(B)(6)	See b)(2)e.
d.	OAC rule 3745-17-11(B)	<p><u>For K012 and K013 individually</u> 0.551 lb particulate emissions (PE)/hr</p> <p>See b)(2)f.</p>
e.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed twenty percent opacity, as a six-minute average except as provided by rule.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)f.
f.	OAC rule 3745-17-11(C)	See b)(2)g. and c)(1).
g.	OAC rule 3745-114-01 ORC 3704.03(F)(4)(b)	See d)(9) through d)(12).
h.	40 CFR Part 63, Subpart M (See 40 CFR Part 63.3880 et seq.)  [In accordance with 40 CFR 63.3881, this emissions unit is a rubber-to-metal coating source at an existing miscellaneous metal parts and products surface coating facility.]	<u>63.3890(a)(4)</u> :  0.81 kg (6.8 lb) organic hazardous air pollutants (HAP) emitted per liter (gal) coating solids used during each 12-month compliance period  See section B.1.a. – FACILITY – WIDE TERMS AND CONDITIONS  See b)(2)h.
i.	40 CFR 63.1-15 (40 CFR 63.3901)	Table 2 to Subpart M of 40 CFR Part 63- Applicability to Subpart M shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. Permit to Install 03-17207 for K012 and K013 takes into account the following voluntary restrictions, individually, as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3)

i. use of a regenerative thermal oxidizer achieving a minimum destruction efficiency of 95% (100% capture)

The potential to emit for emissions unit K012 is 4.03 tons OC/year and was determined by multiplying the maximum OC content of 6.54 lbs/gal by a maximum coating usage rate of 2.80 gal/hr, applying a 95% control efficiency, then multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

The potential to emit for emissions unit K013 is 2.15 tons OC/year and was determined by multiplying the maximum OC content of 6.54 lbs/gal by a maximum coating usage rate of 1.50 gal/hr, applying a 95% control efficiency, then multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

b. Permit to Install 03-17207 for K012 and K013, individually, takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

i. 100% of all cleanup material used to be reclaimed resulting in no emissions from cleanup operations [see c)(3)]. Cleanup solvents are only used in the enclosed booth when coating operations have been



discontinued. The cleanup operation is a closed loop system using covered paint pots and covered pails to recover the used solvents.

- c. A voluntarily request for a grouped annual OC emission limitation of 39.86 tons is being established for K004-K013 and R003-R004 combined to ease the monitoring and recordkeeping requirements for these emissions units.
- d. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to PE from this air contaminant source since the calculated annual emission rate for PE is less than ten tons per year taking into account the federally enforceable rule limit of 0.551 pounds PE per hour from each coating booth operation under OAC rule 3745-17-11(B).
- e. In lieu of complying with the pounds of VOC per gallon of solids limitation contained in paragraph (U) of OAC rule 3745-21-09, the permittee has elected to demonstrate that the capture and control equipment meet the requirements contained in OAC rule 3745-21-09(B)(6). The capture and control requirements specified in OAC rule 3745-21-09(B)(6) are less stringent than the capture and control requirements established pursuant to OAC rule 3745-31-05(C).
- f. The requirements to comply with this rule shall terminate on the date the U.S. EPA approves the requirements based on OAC rule 3745-17-11(C) as a revision to the Ohio SIP for particulate emissions.
- g. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.
- h. The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart M, including the following sections:

63.3900- General requirements for complying with this subpart

63.3901- Applicable General Provisions

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration systems for the control of particulate emissions whenever emissions units K012 and/or K013 are in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (2) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.



- (3) The permittee shall recover 100% of all cleanup material employed in emissions units K012 and K013.
  - (4) The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart M, including the following sections:  
  
63.3892(a) through (c)- Applicable operating limits  
  
63.3893(a) through (c)- Work practice standards
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) The permittee shall collect and record the following information for each coating and cleanup material employed each month for emissions units K004-K013 and R003-R004 combined:
    - a. the name and identification of each coating and cleanup material employed;
    - b. the number of gallons of each coating and cleanup material employed;
    - c. the OC content of each coating and cleanup material employed, as applied, in pounds per gallon;
    - d. the total controlled OC emission rate for all the coatings and cleanup materials, in lbs per month, calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance  $\{[\text{summation of d}(1)\text{c.} \times \text{d}(1)\text{d. (for all coatings and cleanup materials employed)}] \times (1 - \text{over all control efficiency (from the most recent emission testing that demonstrated the emissions unit was in compliance)}]\}$ ; and
    - e. the annual year-to-date organic compound emissions (sum of d)(1)e. for each month to date from January to December).

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

$$\text{OC emissions from cleanup operations} = (\text{total gallons of cleanup material used} \times \text{solvent density of cleanup material}) - (\text{total gallons cleanup material sent off-site for disposal or reclamation} [\text{minus solids content of said material}] \times \text{solvent density}).$$
  - (2) The permittee shall maintain records that document any cleanup operations for K012 and K013 which were not performed as described in b)(2)b.i. and/or reclaimed as specified in d)(1)e. above.
  - (3) The permittee shall comply with the applicable monitoring and record keeping requirements under 40 CFR Part 63, Subpart M, including the following sections:  
  
63.3930(a) through (k)
  - (4) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation



of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (5) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (6) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (7) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

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

- (8) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- (9) The permit-to-install application for these emissions unit(s), K004-K013, R002 and R003 was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:



- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
  - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
  - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "24" hours per day and "7" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: toluene

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

Maximum Hourly Emission Rate (lbs/hr): 9.43

Predicted 1-Hour Maximum Ground Level Concentration (ug/m<sup>3</sup>): 287.3

MAGLC (ug/m<sup>3</sup>): 4486

The permittee, has demonstrated that emissions of toluene, from emissions unit(s) K004-K013, R002 and R003, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

- (10) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground level concentration", the permittee shall re-model the

change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, 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 new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" 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 a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTI prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (11) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
  - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
  - b. the Maximum Acceptable Ground Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
  - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
  - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.



- (12) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

- (1) The permittee shall submit annual reports that summarize the total annual actual OC emissions from K004-K013 and R003-R004 combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation; and
  - b. any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground level concentration; or if no changes to the emissions, emissions unit(s), or the exhaust stack have been made, a statement to this effect.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31, April 30, July 31, and October 31, and shall cover the previous calendar quarters unless an alternative schedule has been established and approved by the Director (Ohio EPA, Northwest District Office).

- (3) The permittee shall notify the Director (Ohio EPA, Northwest District Office) in writing of any daily record showing that cleanup operations which were not performed as described in b)(2)b.i. and/or reclaimed as specified in c)(3) above. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Northwest District Office) within 30 days after the exceedance occurs.
- (4) The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District Office or local air agency as are required pursuant to 40 CFR Part 63, Subpart M, per the following sections:

63.3910(a) through (c) and 63.3920(a) through (c)

f) Testing Requirements

- (1) The permittee shall conduct, or have conducted, emission testing for this emissions unit as required pursuant to 40 CFR Part 63, Subpart M, per the following sections:

63.3960- Timeframe for conducting performance tests and other initial compliance demonstrations

63.3961- How to demonstrate initial compliance



63.3963 through 63.3967- Demonstrating continuous compliance with add-on control equipment

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

a. Emission Limitation:  
0.92 lb OC/hour from K012 coating and cleanup operations

Applicable Compliance Method:

The lb/hr limit represents the emissions unit's potential to emit and was developed by multiplying the maximum hourly coating usage (2.80 gallons/hr), the maximum coating OC content (6.54 lbs/gallon coating) and applying a 95% overall control efficiency (100% capture, 95% destruction efficiency).

Compliant emissions tests were conducted on August 23, 2007 for RTO #1 and on December 8, 2005 for RTO #2. If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR, Part 60 Appendix A, Methods 1-4 and 18, 25 or 25 A.

b. Emission Limitation:  
2.15 tons OC/year from K012 coating and cleanup operations

Applicable Compliance Method:

The annual limitation of 2.15 tons OC/year was established by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

c. Emission Limitation:  
0.49 lb OC/hour from K013 coating and cleanup operations

Applicable Compliance Method:

The lb/hr limit represents the emissions unit's potential to emit and was developed by multiplying the maximum hourly coating usage (1.50 gallons/hr), the maximum coating OC content (6.54 lbs/gallon coating) and applying a 95% overall control efficiency (100% capture, 95% destruction efficiency).

Compliant emissions tests were conducted on August 23, 2007 for RTO #1 and on December 8, 2005 for RTO #2. If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR, Part 60 Appendix A, Methods 1-4 and 18, 25 or 25 A.

d. Emission Limitation:  
2.15 tons OC/year from K013 coating and cleanup operations

Applicable Compliance Method:

The annual limitation of 2.15 tons OC/year was established by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.



- e. Emission Limitation:  
39.86 tons OC/year from coating and cleanup operations from K004-K013 and R003-R004 combined

Applicable Compliance Method:  
Compliance with the 39.86 tons OC/yr combined emission limitation above shall be based upon the record keeping requirements specified in section d)(1) of this permit.

- f. Emission Limitation:  
0.551 pound PE per hour from K012 and K013, individually

Applicable Compliance Method:  
To determine the actual worst case PE rate (E), the following equation shall be used for each individual coating operations:

$E = \text{PE rate (lbs/hr)}$

$E = \text{maximum coating solids usage rate, in pounds per hour } (1-TE) \times (1-CE)$

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with the emission limitation above pursuant to OAC rule 3745-17-03(B)(10).

- g. Emission Limitation:  
Visible particulate emissions (PE) shall not exceed twenty percent opacity, as a six-minute average except as provided by rule.

Applicable Compliance Method:  
If required, compliance with the visible emissions limitation above shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

g) Miscellaneous Requirements

- (1) None.