State of Ohio Environmental Protection Agency

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

Street Address:
122 S. Front Street
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329
Mailing Address:
Lazarus Gov. Center
P.O. Box 1049

Application No: 01-08476

DATE: 12/4/2001

Tech International
Albert Dantzer
200 E Coshocton St
Johnston, OH 43031

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

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

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

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: 12/4/2001**
Terms and Conditions	**Effective Date: 12/4/2001**

FINAL PERMIT TO INSTALL 01-08476

Application Number:	01-08476
APS Premise Number:	0145000083
Permit Fee:	**$1600**
Name of Facility:	Tech International
Person to Contact:	Albert Dantzer
Address:	200 E Coshocton St Johnston, OH 43031

Location of proposed air contaminant source(s) [emissions unit(s)]:
200 E Coshocton St
Johnstown, **Ohio**

Description of proposed emissions unit(s):
Manufacturer of tire repair patches.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized

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

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

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

Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

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

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

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

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

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

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

Pollutant	Tons Per Year
PE	1.8
VOC	26.6

Emissions Unit ID: **P001**

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P001 - dry rubber mixing line with baghouse	OAC rule 3745-31-05(A)(3)	Particulate Emissions (PE) shall not exceed 0.41 lbs/hr and 1.8 tons/yr. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A). See Part II.A.2.a below.
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

2. Additional Terms and Conditions

2.a The 0.41 lbs/hr and 1.8 tons/yr PE limitations were established to reflect the potential to emit for this emissions unit as controlled by the baghouse. Therefore, the parametric monitoring of the baghouse as established in the following terms and conditions will ensure compliance with these limits.

B. Operational Restrictions

1. The permittee shall operate the baghouse at all times this emissions unit is in operation.

2. The pressure drop across the baghouse shall be maintained within the range of 1 thru 8 inches of water while the emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall perform weekly checks, during operation, for visible emissions from the baghouse serving this emissions unit. The presence or absence of any visible emissions from the baghouse shall be noted in an operations log. If visible emissions from the baghouse are observed, the permittee shall also note the following in the operations log:

   a. whether the emissions are representative of normal operations;
   b. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
   c. the total duration of any visible emission incident; and
   d. any corrective actions taken to eliminate the visible emissions.

2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a weekly basis.

D. Reporting Requirements

1. The permittee shall submit written reports which (a) identify all days during which any visible particulate emissions were observed from the fabric filter serving this emissions unit; (b) describe any corrective actions taken to eliminate the visible particulate emissions; and (c) identify that all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days of an abnormal visible emission observation or period of time during which the pressure drop across the baghouse did not comply with the allowable range.

E. Testing Requirements

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

   a. Emissions Limitation:
   Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

   Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations in accordance with 40 CFR Part 60, Appendix A, Method 9.

b. Emissions Limitation:
PE shall not exceed 0.41 lbs/hr and 1.8 tons/yr.

Applicable Compliance Method:
Compliance with the short term emission limitation shall be demonstrated by multiplying the maximum process weight rate of 0.625 tons/hr (PTI application, 10/02/01) by the emission factor of 6 lbs PE/ton (AP-42, 12.18-2, 1-95) and by the control efficiency (1-0.89).

Compliance with the long term emission limitation shall be demonstrated by multiplying the maximum short term emission rate of 0.41 lbs PE/hr by 8760 hrs/yr and dividing by 2000 lbs/ton.

F. Miscellaneous Requirements

None

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R002 - finishing cushion line no.2	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions shall not exceed 3.26 lbs/hr and 40.0 lbs/day excluding cleanup materials and 9.0 tons/yr including cleanup. See Part II.A.2.a below.
	OAC rule 3745-21-07(G)(2)	The 8 lbs/hr emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). The 40 lbs/day emission limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a The 3.26 lbs VOC/hr emission limitation was established to reflect the potential to emit for this emissions unit. Therefore, recordkeeping and reporting requirements are not necessary to ensure compliance with this emissions limit.

B. Operational Restrictions

1. The maximum cement usage for this emissions unit shall not exceed 7.6 gallons of cement per day.

2. The maximum cement usage for this emissions unit shall not exceed 2774 gallons of cement and 480 gallons of cleanup per year.

3. The maximum VOC content for any cement shall not exceed 5.24 pounds per gallon, excluding water and exempt solvents.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information on a daily basis:

   a. the name and identification of each type of cement and cleanup material employed;

   b. the VOC content of each type of cement employed (excluding water and exempt solvents), as applied, in pounds per gallon; and

   c. the number of gallons of each type of cement employed.

2. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

   a. the name and identification of each type of cement and cleanup material employed;

   b. the VOC content of each type of cement employed (excluding water and exempt solvents), as applied, in pounds per gallon;

   c. the VOC content of each type of cleanup material, in pounds per gallon;

   d. the number of gallons of each type of cement and cleanup material employed;

   e. the number of gallons of each type of cleanup material drummed for shipment off-site; and

   f. the total volatile organic compound emission rate, [c x (d-e)].

3. The permit to install for this emissions unit (R002) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in

the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Light Aliphatic Naphtha

TLV (mg/m3): 1370

Maximum Hourly Emission Rate (lbs/hr): 3.26

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 115.3

MAGLC (ug/m3): 32,619

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

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

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

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. If the VOC content limitation, daily usage limitation, annual usage limitation or annual emission limitation is exceeded at any time within the calendar year, the permittee shall submit an excursion (deviation) report which specifies the deviation, the period of time the exceedance occurred and the emissions on a daily and/or annual basis for the period of time the exceedance occurred . This report shall be submitted within 30 days after the deviation occurs.

E. Testing Requirements

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

a. Emissions Limitation:
VOC emissions shall not exceed 3.26 lbs/hr, excluding cleanup materials.

Applicable Compliance Method:
Compliance shall be determined by multiplying the maximum cement usage of 0.622 gal/hr (PTI application, 10/02/01) by the maximum VOC content of the cement of 5.24 lbs VOC/gal.

b. Emissions Limitation:
VOC emissions shall not exceed 40.0 lbs/day, excluding cleanup materials.

Applicable Compliance Method:
Compliance shall be determined through recordkeeping found in Part II.C.1 above.

c. Emissions Limitation:
VOC emissions shall not exceed 9.0 tons/yr, including cleanup.

Applicable Compliance Method:
Compliance shall be determined through recordkeeping found in Part II.C.2 above.

F. Miscellaneous Requirements

None

Emissions Unit ID: **R003**

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R003 - finishing cement line no.3	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions shall not exceed 3.26 lbs/hr and 40.0 lbs/day excluding cleanup materials and 9.0 tons/yr including cleanup. See Part II.A.2.a below.
	OAC rule 3745-21-07(G)(2)	The 8 lbs/hr emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). The 40 lbs/day emission limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a The 3.26 lbs VOC/hr emission limitation was established to reflect the potential to emit for this emissions unit. Therefore, recordkeeping and reporting requirements are not necessary to ensure compliance with this emissions limit.

B. Operational Restrictions

1. The maximum cement usage for this emissions unit shall not exceed 7.6 gallons of cement per day.

2. The maximum cement usage for this emissions unit shall not exceed 2774 gallons of cement and 480 gallons of cleanup per year.

3. The maximum VOC content for any cement shall not exceed 5.24 pounds per gallon, excluding water and exempt solvents.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information on a daily basis:

   a. the name and identification of each type of cement and cleanup material employed;

   b. the VOC content of each type of cement employed (excluding water and exempt solvents), as applied, in pounds per gallon; and

   c. the number of gallons of each type of cement employed.

2. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

   a. the name and identification of each type of cement and cleanup material employed;

   b. the VOC content of each type of cement employed (excluding water and exempt solvents), as applied, in pounds per gallon;

   c. the VOC content of each type of cleanup material, in pounds per gallon;

   d. the number of gallons of each type of cement and cleanup material employed;

   e. the number of gallons of each type of cleanup material drummed for shipment off-site; and

   f. the total volatile organic compound emission rate, [c x (d-e)].

3. The permit to install for this emissions unit (R003) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic

Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Light Aliphatic Naphtha

TLV (mg/m3): 1370

Maximum Hourly Emission Rate (lbs/hr): 3.26

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 2428

MAGLC (ug/m3): 32,619

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

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts

evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

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

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. If the VOC content limitation, daily usage limitation, annual usage limitation or annual emission limitation is exceeded at any time within the calendar year, the permittee shall submit an excursion (deviation) report which specifies the deviation, the period of time the exceedance occurred and the emissions on a daily and/or annual basis for the period of time the exceedance occurred . This report shall be submitted within 30 days after the deviation occurs.

E. Testing Requirements

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

a. Emissions Limitation:
VOC emissions shall not exceed 3.26 lbs/hr, excluding cleanup materials.

Applicable Compliance Method:
Compliance shall be determined by multiplying the maximum cement usage of 0.622 gal/hr (PTI application, 10/02/01) by the maximum VOC content of the cement of 5.24 lbs VOC/gal.

b. Emissions Limitation:
VOC emissions shall not exceed 40.0 lbs/day, excluding cleanup materials.

Applicable Compliance Method:
Compliance shall be determined through recordkeeping found in Part II.C.1 above.

c. Emissions Limitation:
VOC emissions shall not exceed 9.0 tons/yr, including cleanup.

Applicable Compliance Method:
Compliance shall be determined through recordkeeping found in Part II.C.2 above.

F. Miscellaneous Requirements

None

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R004 - glue room	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions shall not exceed 5.31 lbs/hr and 40.0 lbs/day excluding cleanup materials and 7.3 tons/yr including cleanup. See Part II.A.2.a below.
	OAC rule 3745-21-07(G)(2)	The 8 lbs/hr emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). The 40 lbs/day emission limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a The 5.31 lbs VOC/hr emission limitation was established to reflect the potential to emit for this emissions unit. Therefore, recordkeeping and reporting requirements are not necessary to ensure compliance with this emissions limit.

B. Operational Restrictions

1. The maximum cement usage for this emissions unit shall not exceed 6.9 gallons of cement per day.

2. The maximum cement usage for this emissions unit shall not exceed 2518 gallons of cement per year and 120 gallons of cleanup per year.

3. The maximum VOC content for any cement shall not exceed 5.8 pounds per gallon, excluding water and exempt solvents.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information on a daily basis:

   a. the name and identification of each type of cement and cleanup material employed;

   b. the VOC content of each type of cement employed (excluding water and exempt solvents), as applied, in pounds per gallon; and

   c. the number of gallons of each type of cement employed.

2. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions:

   a. the name and identification of each type of cement and cleanup material employed;

   b. the VOC content of each type of cement employed (excluding water and exempt solvents), as applied, in pounds per gallon;

   c. the VOC content of each type of cleanup material, in pounds per gallon;

   d. the number of gallons of each type of cement and cleanup material employed;

   e. the number of gallons of each type of cleanup material drummed for shipment off-site; and

   f. the total volatile organic compound emission rate, [c x (d-e)].

3. The permit to install for this emissions unit (R004) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic

Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Light Aliphatic Naphtha

TLV (mg/m3): 1370

Maximum Hourly Emission Rate (lbs/hr): 5.31

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 115.4

MAGLC (ug/m3): 32,619

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

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts

evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

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

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. If the VOC content limitation, daily usage limitation, annual usage limitation or annual emission limitation is exceeded at any time within the calendar year, the permittee shall submit an excursion (deviation) report which specifies the deviation, the period of time the exceedance occurred and the emissions on a daily and/or annual basis for the period of time the exceedance occurred . This report shall be submitted within 30 days after the deviation occurs.

E. Testing Requirements

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

a. Emissions Limitation:
VOC emissions shall not exceed 5.31 lbs/hr, excluding cleanup.

Applicable Compliance Method:
Compliance shall be determined by multiplying the maximum cement usage of 0.915 gal/hr (PTI application, 10/02/01) by the maximum VOC content of the cement of 5.8 lbs VOC/gal.

b. Emissions Limitation:
VOC emissions shall not exceed 40 lbs/day, excluding cleanup.

Applicable Compliance Method:
Compliance shall be determined through recordkeeping found in Part II.C.1 above.

c. Emissions Limitation:
VOC emissions shall not exceed 7.3 tons/yr, including cleanup.

Applicable Compliance Method:
Compliance shall be determined through recordkeeping found in Part II.C.2 above.

F. Miscellaneous Requirements

None

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R008 - sheet dipping/spraying operation	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions shall not exceed 2.18 lbs/hr and 40.0 lbs/day and 0.93 tons/yr . See Part II.A.2.a below.
	OAC rule 3745-21-07(G)(2)	The 8 lbs/hr emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). The 40 lbs/day emission limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a The 2.18 lbs VOC/hr emission limitation was established to reflect the potential to emit for this emissions unit. Therefore, recordkeeping and reporting requirements are not necessary to ensure compliance with this emissions limit.

B. Operational Restrictions

1. The maximum dipping solution usage for this emissions unit shall not exceed 6.06 gallons of cement per day.

2. The maximum dipping solution usage for this emissions unit shall not exceed 280 gallons per year.

3. The maximum VOC content for the dipping solution shall not exceed 6.6 pounds per gallon, excluding water and exempt solvents.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information on a daily basis:

   a. the name and identification of each type of dipping solution employed;

   b. the VOC content of each type of dipping solution employed (excluding water and exempt solvents), in pounds per gallon; and

   c. the number of gallons of each type of dipping solution employed.

2. The permittee shall determine annual VOC emissions by the following calculation: the permittee shall sum the daily gallon usage of each respective dipping solution, found in C.1.c above and multiply by the respective VOC content found in C.1.b above, then divide by 2000 lbs/ton.

D. Reporting Requirements

1. If the VOC content limitation, daily usage limitation or annual usage limitation is exceeded at any time within the calendar year, the permittee shall submit an excursion (deviation) report which specifies the deviation, the period of time the exceedance occurred and the emissions on a daily and/or annual basis for the period of time the exceedance occurred . This report shall be submitted within 30 days after the deviation occurs.

E. Testing Requirements

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

   a. Emissions Limitation:
   VOC emissions shall not exceed 2.18 lbs/hr.

   Applicable Compliance Method:
   Compliance shall be determined by multiplying the maximum dipping solution usage of

0.33 gal/hr (PTI application, 10/02/01) by the maximum VOC content of the cement of 6.6 lbs VOC/gal.

b. Emissions Limitation:
VOC emissions shall not exceed 40 lbs/day.

Applicable Compliance Method:
Compliance shall be determined through recordkeeping found in Part II.C.1 above.

c. Emissions Limitation:
VOC emissions shall not exceed 0.93 tons/yr.

Applicable Compliance Method:
Compliance shall be determined through recordkeeping found in Part II.C.1 above.

F. Miscellaneous Requirements

None