Ohio Environmental Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)

5/21/2010

Mr. James Haug
Select Industries Corporation
60 Heid Avenue
PO Box 887
Dayton, OH 45401

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0857045020
Permit Number: P0106288
Permit Type: Initial Installation
County: Montgomery

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Dayton Daily News. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and

Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Regional Air Pollution Control Agency at (937)225-4435.

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*
RAPCA; Indiana; Kentucky

Montgomery County

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
Select Industries Corporation

Issue Date: 5/21/2010
Permit Number: P0106288
Permit Type: Initial Installation
Permit Description: Initial installation of Glyon Mixing, Glycon Etching and Glyon Spray Booth
Facility ID: 0857045020
Facility Location: Select Industries Corporation
60 Heid Ave, P O Box 887
Dayton, OH 45404
Facility Description: Motor Vehicle Metal Stamping

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Carlos Lynch at Regional Air Pollution Control Agency, 117 South Main Street, Dayton, OH 45422-1280 or (937)225-4435. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc

Permit Strategy Write-Up

1. Check all that apply:

   _x_ Synthetic Minor Determination

   ___ Netting Determination

2. Source Description:

   Select Industries is a stamping and value-adding assembly facility providing products for the automotive and truck markets. The facility will be installing a new Gylon product line. This line involves the manufacturing of an existing sintered Teflon-based friction material trademarked as Gylon. Once manufactured, the friction material is heat bonded onto various purchased metal components with value-added machining to create a multitude of Medium/Heavy Duty Pin Type synchronizers for the large and off-road markets. The Gylon sheets will be produced in batches by measuring and manually inserting various non-liquid materials into a mixer to which solvent is directly fed from a bulk storage container. Once mixed, the "dough" is then automatically poured into pans (similar to large cookie sheets) and placed into an electric oven to cure. After curing, the Gylon sheets are removed from the pans, pressed flat, etched in a dip tank, washed and dried, sprayed two coatings in an enclosed booth, dried in an electric oven, and then cut into thin strips for delivery to the final staging area.

3. Facility Emissions and Attainment Status:

   The facility is located in the City of Dayton (Montgomery County is designated as attainment for all criteria pollutants including ozone). Select Industries has three plants located in close proximity. The emissions from all three plants were evaluated. Without any federally enforceable restrictions the facility is a major source of VOC. The maximum potential emissions calculations were based upon maximum process capacities and a maximum operating scenario (8760 hours per year). The potential VOC emissions exceeded 100 tons per year, so the facility would be considered a major source subject to TV permitting requirements. This was based primarily on a large quantity of VOC emissions from the solvent in the new Gylon mixing process.

4. Source Emissions:

   The potential emission of VOC from the new Gylon product line without any federally enforceable restriction is greater than 100 tons per year. The main processes are P001-Gylon mixing, P002-Gylon Etching and R001-Gylon spray booth. Select Industries will not operate the new Gylon production line at the maximum process capacities for the raw material added or anywhere near the maximum operating scenario. The facility can easily limit the potential VOC emissions beneath 100 tons per year and therefore avoiding TV permitting requirements. The permittee is proposing to accept federally enforceable restrictions on the production rate of Gylon sheets. Therefore restricting the VOC emissions to avoid TV permitting requirements.

5. Conclusion:

   Select Industries will become a Synthetic Minor facility by means of limiting the number of Gylon sheets produced effectively restricting the facility PTE for VOC to below Title V permitting threshold levels. Monthly monitoring, record keeping and calculations along with quarterly deviation reports for the

emissions limitation and operational restrictions will be required to monitor compliance. Therefore, since the allowable VOC emissions are below Major Stationary source Title V operating permit requirements threshold levels, this facility will remain a minor source.

6. Please provide additional notes or comments as necessary:

   None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

Pollutant	Tons Per Year
VOC	78.03

Ohio | Environmental Protection Agency

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
Select Industries Corporation

Facility ID:	0857045020
Permit Number:	P0106288
Permit Type:	Initial Installation
Issued:	5/21/2010
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
Select Industries Corporation

Table of Contents

Authorization 1

A. Standard Terms and Conditions 3

1. What does this permit-to-install and operate ("PTIO") allow me to do? 4
2. Who is responsible for complying with this permit? 4
3. What records must I keep under this permit? 4
4. What are my permit fees and when do I pay them? 4
5. When does my PTIO expire, and when do I need to submit my renewal application? 5
6. What happens to this permit if my project is delayed or I do not install or modify my source? 5
7. What reports must I submit under this permit? 5
8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit? 5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? 6
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? 6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? 6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? 6
13. Can I transfer this permit to a new owner or operator? 7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? 7
15. What happens if a portion of this permit is determined to be invalid? 7

B. Facility-Wide Terms and Conditions 8

C. Emissions Unit Terms and Conditions 10

1. P001, Gylon Mixing 11
2. P002, Gylon Etching 15
3. R001, Gylon Surface Coating 19

Authorization

Facility ID: 0857045020
Application Number(s): A0039442
Permit Number: P0106288
Permit Description: Initial installation of Glyon Mixing, Glycon Etching and Glyon Spray Booth
Permit Type: Initial Installation
Permit Fee: $600.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 5/21/2010
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance

Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Select Industries Corporation
60 Heid Ave
P O Box 887
Dayton, OH 45404

of a Permit-to-Install and Operate 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:

Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280
(937)225-4435

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (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 described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Authorization (continued)

Permit Number: P0106288
Permit Description: Initial installation of Glyon Mixing, Glycon Etching and Glyon Spray Booth

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

Emissions Unit ID:	**P001**
Company Equipment ID:	Gylon mixing
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P002**
Company Equipment ID:	Gylon etching
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R001**
Company Equipment ID:	Gylon Surface Coating
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

  You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Regional Air Pollution Control Agency in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means 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.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting[1] a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

[1] Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

   a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

      (1) None.

   b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

      (1) None.

C. Emissions Unit Terms and Conditions

1. P001, Gylon Mixing

Operations, Property and/or Equipment Description:

Gylon Mixing (new installation)

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The emissions of volatile organic compounds (VOC) from this emissions unit shall not exceed 6.34 lbs VOC/Gylon sheet produced. The requirements established pursuant to this rule also include the requirement of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V and PSD)	The emissions of VOC from this emissions unit shall not exceed 65.95 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The maximum annual production rate for this emissions unit shall not exceed 20,805 Gylon sheets, based upon a rolling, 12-month summation of the production rates.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the production levels specified in the following table:

Month	Maximum Allowable Cumulative Production
1	1734
1-2	3468
1-3	5204
1-4	6936
1-5	8670
1-6	10,404
1-7	12,138
1-8	13,872
1-9	15,606
1-10	17,340
1-11	19,074
1-12	20,805

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information:

a. The number of gallons of Mineral Spirits solvent used.

b. The number of gallons of Mineral Spirits solvent recovered.

c. The VOC content of the Mineral Spirits as applied.

d. The total VOC emissions from the Mineral Spirits for each month in tons.

[d)(1)a. - d)(1)b. x d)(1)c].

e. Beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the VOC emissions.

f. The production rate of Gylon sheets for each month.

g. Beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the production rates of Gylon sheets.

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative production rate of Gylon sheets for each calendar month.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emissions limitations and operational restrictions that restrict the potential to emit (PTE) of any regulated air pollutant that have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. All exceedances of the rolling, 12-month production rate limitation; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative production rate levels.

ii. All exceedances of the rolling, 12-month VOC emissions limitation.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. The magnitude and duration of each deviation (excursion).

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 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

(2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation-

The emissions of VOC from this emissions unit shall not exceed 6.34 lbs VOC/ Gylon sheet produced.

Applicable Compliance Method-

Compliance shall be determined by multiplying the maximum solvent usage per Gylon sheet produced, by the maximum VOC content of any solvent employed in this emissions unit.

b. Emissions Limitation-

The emissions of VOC from this emissions unit shall not exceed 65.95 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method-

Compliance shall be based on the record keeping requirements specified in d)(1).

g) Miscellaneous Requirements

(1) None.

2. P002, Gylon Etching

Operations, Property and/or Equipment Description:

Gylon Etching (new installation)

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The emissions of volatile organic compounds (VOC) from this emissions unit shall not exceed 0.25 lb VOC/Gylon sheet etched. The requirements established pursuant to this rule also include the requirement of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V and PSD)	The emissions of VOC from this emissions unit shall not exceed 2.6 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The maximum annual production rate for this emissions unit shall not exceed 20,805 Gylon sheets etched, based upon a rolling, 12-month summation of the production rates.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the production levels specified in the following table:

Month	Maximum Allowable Cumulative Production
1	1734
1-2	3468
1-3	5204
1-4	6936
1-5	8670
1-6	10,404
1-7	12,138
1-8	13,872
1-9	15,606
1-10	17,340
1-11	19,074
1-12	20,805

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information:

a. The name and identification of each solvent employed.

b. The VOC content of each solvent as applied.

c. The number of gallons of each solvent as applied.

d. The total monthly VOC emissions from Gylon sheet etching in tons.

[d)(1)b. x d)(1)c].

e. Beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the VOC emissions.

f. The production rate of Gylon sheets etched for each month.

g. Beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the production rates of Gylon sheets etched.

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative production rate of Gylon sheets etched for each calendar month.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations and operational restrictions that restrict the potential to emit (PTE) of any regulated air pollutant that have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. All exceedances of the rolling, 12-month production rate limitation; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative production rate levels.

ii. All exceedances of the rolling, 12-month emission limitation for VOC.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. The magnitude and duration of each deviation (excursion).

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 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

(2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation

report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation-

The emissions of VOC from this emissions unit shall not exceed 0.25 lb VOC/Gylon sheet etched.

Applicable Compliance Method-

Compliance shall be determined by multiplying the maximum solvent usage per Glyon sheet etched by the maximum VOC content of any solvent employed in this emissions unit.

b. Emissions Limitation-

The emissions of VOC from this emissions unit shall not exceed 2.6 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method-

Compliance shall be based on the record keeping requirements specified in d)(1).

g) Miscellaneous Requirements

(1) None.

3. R001, Gylon Surface Coating

Operations, Property and/or Equipment Description:

Spray application of adhesive onto Gylon sheets in spray booth (new installation)

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The emissions of volatile organic compound (VOC) from this emissions unit shall not exceed 6.65 lbs/hr. The requirements established pursuant to this rule also include the requirement of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V and PSD)	The emissions of VOC from this emissions unit shall not exceed 9.48 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

(2) Additional Terms and Conditions

a. The hourly emissions limitation was established for PTIO purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

c) Operational Restrictions

a. The maximum annual VOC usage rate from this emissions shall not exceed 9.48 tons per year, based upon a rolling, 12-month summation of the VOC figures.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the VOC usage levels specified in the following table:

Month	Maximum Allowable Cumulative Usage (tons)
1	0.79
1-2	1.58
1-3	2.37
1-4	3.16
1-5	3.95
1-6	4.74
1-7	5.53
1-8	6.32
1-9	7.11
1-10	7.9
1-11	8.69
1-12	9.48

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information:

a. The name and identification of each coating and adhesive material employed.

b. The volume in gallons of each coating material employed.

c. The volume in gallons of each adhesive material employed

d. The VOC content of each coating and adhesive material employed, in pounds per gallon.

e. The total VOC emissions from coating and adhesive materials for each month in tons. [d)(1)b. x d)(1)d]. + [d)(1)c. x d)(1)d.]

f. Beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the VOC usage rates.

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

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions that restrict the potential to emit (PTE) of any regulated air pollutant that have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. All exceedances of the rolling, 12-month VOC usage limitation; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative VOC usage levels.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. The magnitude and duration of each deviation (excursion).

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 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

(2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit..

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation-

The emissions of VOC from this emissions unit shall not exceed 6.65 lbs/hr.

Applicable Compliance Method-

Compliance shall be determined by multiplying the maximum hourly coating and adhesive usage times the maximum VOC content of any coating and adhesive employed in this emissions unit.

b. Emissions Limitation-

The emissions of VOC from this emissions unit shall not exceed 9.48 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method-

Compliance shall be based on the record keeping requirements specified in d)(1).

g) Miscellaneous Requirements

(1) None.