Certified Mail

5/27/2010

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)

Mr. Mark Schuetz
Replex Mirror Company
Post Office Box 967
Mount Vernon, OH 43050

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0142000109
Permit Number: P0106022
Permit Type: OAC Chapter 3745-31 Modification
County: Knox

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, Mt. Vernon 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

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049

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 Ohio EPA DAPC, Central District Office at (614)728-3778.

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-CDO

Permit Strategy Write-Up

1. Check all that apply:

   X Synthetic Minor Determination

   ___ Netting Determination

2. Source Description: On January 19, 2010, Replex Mirror Company of Mt Vernon, Knox County, a non-Title V facility (ID No. 0142000109), submitted application (A0038808) for three spray booths and a dip tank at the existing facility. Three of the four units have previously been permitted under PTI 01-12130. This permit is a Chapter 31 modification for P001 spray booth. The facility wants to change coatings to a higher HAP content coating. They are requesting a voluntary restriction on coating usage of 6656 gallons as a rolling, 12-month summation. This coating usage amount will result in an allowable VOC emission increase, and establish a federally enforceable restriction to avoid Title V for, facility wide, total HAP emissions and single HAP emissions.

3. Facility Emissions and Attainment Status: Knox County is in full attainment for all pollutant standards. Replex Mirrors will not be a "Major Source" for volatile organic compound (VOC) emissions, single hazardous air pollutant (HAP) or combined total HAPs, based upon the restrictions of VOC emissions from units P001, P002, P003 and P004. Therefore, this facility is not subject to the requirements of Title V.

4. Applicable Regulations

   OAC rule 3745-17-07(A)(1) "Visible Particulate Emission Limitations for Stack Emissions" – This regulation is applicable to the P001 spray booth. The regulation states that "visible particulate emissions from any stack shall not exceed twenty percent opacity as a six-minute average." The spray booth will be equipped with dry filters to minimize particulate matter and visible emissions. Compliance with this rule is expected.

   OAC rule 3745-17-11(B) "Particulate Emissions Limitations" - This rule states, for Knox County, the allowable particulate emission rate shall be determined using "Table 1", process weight less than 100 lb/hr.

   OAC rule 3745-17-11(C) "Requirements for Surface Coating Processes" - This rule is applicable to the spray booth and outlines work practice standards, recordkeeping, inspection and maintenance requirements for coating operations. For the spray booth, it specifically addresses operating and maintaining the dry filter system.

   OAC rule 3745-21-07(G)(2) "Operations using Liquid Organic Material" – As this emissions unit establishes a synthetic minor limitation to avoid Title V for this facility, this regulation is applicable to the existing robotic spray booth and states that the facility shall not discharge more than forty pounds of organic material into the atmosphere in any one day, nor more than eight pounds in any one hour of photochemically reactive material or substance containing such photochemically reactive material, unless said discharge has been reduced by at least eighty five percent. The eight pounds per hour and forty pounds per day emissions restrictions of this rule, however, shall cease to be effective and federally enforceable on the date the U.S. EPA approves the current OAC rule 3745-21-07 as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, these emission limitations and the associated monitoring, record keeping, reporting, and testing requirements shall be void.

OAC rule 3745-31-05(D) "Federally Enforceable" and ORC 3704.03(T) - The evaluation procedure outlined in Mike Hopkin's December 10, 2009, memo was followed to apply appropriate BAT to emissions unit

P001. In following the outlined procedure, it was determined that case-by-case limits will apply to this emissions source as BAT (see Step 4 in memo). BAT in this case has been determined to be the potential VOC emissions when the federally enforceable restriction of 6656 gallons per 12–month rolling summation is applied, as directed in Step 4, second sub step, example (3), "BAT shall be expressed in raw material specifications or throughput limitations averaged over a twelve-month rolling period." Case-by-case BAT for particulates will be the work practices listed in OAC rule 3745-17-11(C) "Requirements for Surface Coating Processes", as directed in Step 4, second sub step, example (1), "BAT shall be expressed in work practices."

OAC rule 3745-114 "Toxic Air Contaminants" – According to information provided by the applicant, toxic emissions associated with emissions source P001 include toluene, xylene, ethyl benzene, di (2-ethylhexyl) phthlalate, methyl isobutyl ketone, and methyl alcohol from coatings. Maximum worst-case toxics emissions from coatings were modeled to be 4.19 lbs/hr toluene.

[(6656 gal/yr)(93.33%)(2.6145 lb Toluene/gal) + (6656 gal/yr)(6.52%)(0.3299 lb Toluene/gal)] / 6656 gal/yr = 2.46 lb toluene/gal (1.6 gal/hr) = 3.94 lb toluene/hr actual emissions

This coating operation has 2 vents, one at the spray robot and one at the oven. Both vents are rectangular and horizontal. The toluene emission rate was divided in half and modeled with each vent and the maximum ground level concentrations were then added together for the total "modeled emission rate" by the applicant. CDO modeled emissions from both vents separately, assuming that all emissions exited through either one or the other vent. CDO's conservative modeling results indicated that the MAGLC would not be exceeded beyond the fenceline. For the sake of simplicity, only the worst-case result (most conservative) will be presented in the permit document.

The inside stack diameter of each rectangular, horizontal, vent was calculated according to EG 69:

Robot Vent: Dia = $2(\text{area}/\pi)^{1/2} = 2[(3.2\text{ft} \times 1.46\text{ft}) / \pi)]^{1/2}$ = 2.45 ft. = 0.7468 meters
Deq = $31.6\ (D)\ v^{1/2} = 31.6(0.7468\text{m})(1.7823\text{ mps})^{1/2}$ = <u>31.5 meters</u>

Oven Vent: Dia = $2(\text{area}/\pi)^{1/2} = 2[(1.88\text{ft} \times 0.96\text{ft}) / \pi)]^{1/2}$ = 1.52 ft. = 0.4633 meters
Deq = $31.6\ (D)\ v^{1/2} = 31.6(0.4633\text{m})(2.2956\text{ mps})^{1/2}$ = <u>22.2 meters</u>

The stack exit velocity modeled was 0.001 m/s, as directed by EG 69.

Because the emissions of the worst-case toxic air pollutant are above one ton per year, screen modeling was performed to demonstrate compliance with the respective MAGLCs as shown in the table below.

Pollutant	Emission Rate (lb/hr)	Modeled Emission Rate (ug/m^3)	Modeled Fenceline Emission Rate (ug/m^3)	TLV (ug/m^3)	MAGLC (ug/m^3)
toluene (applicant calculations)	4.19 (½ to booth, ½ to oven)	3666 @ 33m		75.36	3768
toluene (CDO booth emission	4.2	4135 @ 33m	2834 @ 53m	75.36	3768

s)					
toluene (CDO oven emissions)	4.2	4497@ 33m	3271 @ 49m	75.36	3768

All toxic emissions modeled demonstrated compliance. A toxics condition will be included in the permit outlining the parameters and the results of the modeling performed.

5. Source Emissions:

This FEPTIO contains terms and conditions that restrict the VOC emissions from emissions unit P001 to 16.8 tons per year to avoid Title V requirements for HAPs through a federally enforceable 12 month coating usage limitation. Due to the limitation of the coating usage, P001 will be inherently limited to single HAP emissions less than 10 tons per year and combined total HAPs emissions to less than 25 tons per year. Therefore, the Title V requirements will not apply to this facility. Replex Mirrors Company is also required by this permit to track VOC emissions, coating usage, keep records, and submit reports. Facility-wide emissions of HAPS are inherently limited based upon established limits on VOC emissions for P002, P003, and P004; none of these units emit toluene.

Summary of HAP emissions facility-wide (in conjunction with permitting application A0038808):

Single Highest Hazardous Air Pollutant Emission	Tons/Year
Paint-Line P001 (Toluene)	8.2
Paint Booth P002 (Ethylene Glycol Mono-Butyl Ether)	0.60
Paint Booth P003 (Ethylene Glycol Mono-Butyl Ether)	0.66
Color Infusion Dip Tank P004 (Ethylene Glycol Mono-Butyl Ether)	0.49

Total Hazardous Air Pollutant (HAP) Emissions	Tons/Year
Paint-Line P001	10.39
Paint Booth P002	0.60
Paint Booth P003	0.66
Color Infusion Dip Tank P004	0.50
Total Potential Facility HAP Emissions	12.15

VOC EMISSIONS

P001

Coatings	*VOC content*	*% composition of coating*
IVC 56146	5.036 lb/gal	93.33
Vankote A-2006	5.36 lb/gal	6.52
Clear Coat C-1	4.66	0.15

[(6656 gal/yr)(93.33%)(5.036 lb VOC/gal) + (6656 gal/yr)(6.52%)(5.36 lb VOC/gal) + (6656 gal/yr)(0.15%)(4.66 lb VOC/gal)] / 6656gal/yr = 5.057 lb VOC/gal

The coating application rate is 1.60 gallons per hour; operational hours are 2 shifts, 5 days per week, 4160 hours per year.

(5.057 lb VOC/gal)(1.60 gal/hr) = 8.09 lb VOC/hr
(8.09 lb VOC/hr)(4160 hr/yr) / 2000 lb/ton = 16.8 TPY VOC

Clean-up

According to the application, there are no clean up materials or solvents used with this emissions unit.

PE EMISSIONS

The uncontrolled mass rate of emissions in lb/hr is:
[(6656 gal/yr)(93.33%)(39.61% solids)(8.34 lb/gal) + (6656 gal/yr)(6.52%)(34.87% solids)(8.26 lb/gal) + (6656 gal/yr)(0.15%)(43.95% solids)(8.34 lb/gal)] / 6656gal/yr = 3.28 lb solids/gal x 1.6 gal/hr = 5.24 lb PE/hr

Therefore, A = 0.20 x 5.24 lbPE/hr = 1.05 lb PE/hr x 4160 hours/yr / 2000 lb/ton = 2.2 TPY PE

6. Conclusion: The issuance of PTI P0105894 is recommended. The emission limitations contained in this FEPTIO are adequate to provide federally enforceable limitations to ensure that the applicable MACT and Title V thresholds will not be exceeded.

7. Please provide additional notes or comments as necessary: The oven used with the coating operation of P001 is an infrared oven. Therefore, no emissions, except VOCs from the coatings, are anticipated from the oven exhaust.

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

Pollutant	Tons Per Year
VOC	16.8
PE	2.2

Knox County

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
Replex Mirror Company

Issue Date: 5/27/2010
Permit Number: P0106022
Permit Type: OAC Chapter 3745-31 Modification
Permit Description: Chap 31 Modification for P001
Facility ID: 0142000109
Facility Location: Replex Mirror Company
11 Mount Vernon Avenue,
Mount Vernon, OH 43050
Facility Description: All Other Plastics Product Manufacturing

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 Sara Geary at Ohio EPA DAPC, Central District Office, 50 West Town Street, 6th Floor P.O. Box 1049, Columbus, OH 43216-1049 or (614)728-3778. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc

Ohio | Environmental Protection Agency

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
Replex Mirror Company

Facility ID: 0142000109
Permit Number: P0106022
Permit Type: OAC Chapter 3745-31 Modification
Issued: 5/27/2010
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
Replex Mirror Company

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Authorization

Facility ID: 0142000109
Application Number(s): A0038808
Permit Number: P0106022
Permit Description: Chap 31 Modification for P001
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: $200.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 5/27/2010
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:

Replex Mirror Company
11 Mount Vernon Avenue
Mount Vernon, OH 43050

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:

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

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: P0106022
Permit Description: Chap 31 Modification for P001

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:	Robotic Paintline for Plastic Mirrors
Superseded Permit Number:	01-12130
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 Ohio EPA DAPC, Central District Office 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, Robotic Paintline for Plastic Mirrors

Operations, Property and/or Equipment Description:

Paintline For Plastic Mirror Parts - Robotic Paint Booth and Flash/Curing Oven

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. b)(1)g., d)(5), d)(6), d)(7), d)(8) and e)(2)

(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. b)(1)b. and c)(2)

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.	ORC 3704.03(T)	Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 16.8 tons per year, as a rolling 12-month summation.
b.	OAC rule 3745-31-05(D) [Federally Enforceable limit on potential to emit to avoid Title V and 40 CFR Part 63, Subpart PPPP]	VOC emissions from this emissions unit shall not exceed 16.8 tons per year, as a rolling 12-month summation.
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Particulate emissions (PE) shall not exceed 0.551 pounds per hour and 2.41 tons per year. See b)(2)c
d.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)d
e.	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 the rule.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	OAC rule 3745-21-07(G)(2)	See b)(2)a and b)(2)b
g.	ORC 3704.03(F)(4)(c)	See b)(2)e and d)(5), d)(6), d)(7), and d)(8).
h.	OAC rule 3745-17-11(B)	The requirements established pursuant to this rule are equivalent to the short term particulate emission limitation included in OAC rule 3745-31-05(A)(3).
i.	OAC rule 3745-17-11(C)	See b)(2)f. and d)(9) through d)(13)

(2) Additional Terms and Conditions

a. Each day that a photochemically reactive material [as defined in OAC 3745-21-01(C)(5)] is employed, the organic compound (OC) emissions from all coatings and from photochemically reactive cleanup or thinner materials shall not exceed 8 pounds per hour and 40.0 pounds per day. OC emissions from clean up material that is not a photochemically reactive material shall not be included in showing compliance with this limit.

b. 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:

b)(1)f, b)(2)a, d)(1), f)(1)a and f)(1)b.

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.

c. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy

BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

d. The following terms and conditions apply once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan:

i. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions from this source since the calculated annual emissions rate for PE is less that 10 tons/yr taking into account the federally enforceable rule limit of 0.551 pounds per hour under OAC rule 3745-17-11(B)

e. In order to demonstrate compliance with the "Toxic Air Contaminant Statute", the Director has established, per ORC 3704.03(F)(4)(c), a limit for toluene, which shall not exceed 67.2 pound(s) per day. This daily allowable emissions rate was calculated by multiplying the approved daily operating schedule of 16 hours per day and 5 days per week submitted in the permit application, by the emission rate modeled (to determine the ground level concentration).

f. 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.

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 maximum annual coating usage for this emissions unit shall not exceed 6656 gallons, based upon a rolling 12-month summation of the coating usage figures, to avoid being subject to the requirements of Title V.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the coating usage, upon issuance of this permit.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for each day for the coating operation:

a. the company identification for each coating and photochemically reactive cleanup material employed;

b. the number of gallons of each coating and photochemically reactive cleanup material employed;

c. the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;

d. for each day during which a photochemically reactive material is employed, the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;

e. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation; and

f. for each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of"photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

(2) The permittee shall maintain daily records of the hours of operation of this emissions unit.

(3) The permittee shall collect and record the following information on a monthly basis for the purpose of demonstrating compliance with the rolling, 12-month summation of VOC emissions limitation and rolling, 12-month summation of coating usage limitation:

a. the company identification for each coating and cleanup material employed;

b. the number of gallons of each coating and cleanup material employed;

c. the total number of gallons of coating employed;

d. the VOC content of each coating and cleanup material employed, in pounds per gallon;

e. the monthly VOC emissions from the emissions unit (b * c) for each coating and cleanup material employed;

f. the total monthly VOC emissions from this emissions unit (sum of e for all coatings and cleanup materials employed), in pounds and tons;

g. the rolling, 12-month summation of VOC emissions, in tons, (f + the previous 11 months); and

h. the rolling, 12-month summation of coating usage, in gallons.

(4) The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

(5) The federally enforceable permit-to-install and operate (FEPTIO) application for this/these emissions unit(s), P001, 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 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., "16" hours per day and "5" 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 or "worst case" toxic contaminant(s):

Toxic Contaminant: toluene

TLV (mg/m3): 75.36

Maximum Hourly Emission Rate (lbs/hr): 4.19

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3666

MAGLC (ug/m3): 3768

The permittee, having demonstrated that emissions of toluene, from emissions unit(s) P001, is estimated to be equal or greater than eighty per cent, but less than 100 per cent of the maximum acceptable ground level concentration (MAGLC), shall not operate the emissions unit(s) at a rate that would exceed the daily emissions rate, process weight rate, and/or restricted hours of operations, as allowed in this permit; and 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).

(6) 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", ORC 3704.03(F), 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 FEPTIO 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.

(7) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute":

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.

(8) The permittee shall maintain a record of any change made to a parameter orvalue 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.

(9) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

(10) 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.

(11) 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.

(12) 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.

(13) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

e. the date of the inspection;
f. a description of each/any problem identified and the date it was corrected;
g. a description of any maintenance and repairs performed; and
h. 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.

(14) 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.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports of any exceedance of the rolling, 12-month coating usage limitation**.** The quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

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

a. Emissions Limitation:

8.0 pounds per hour of OC emissions for each day that photochemically reactive materials are employed.

Applicable Compliance Method:

Compliance shall be determined by the daily values calculated in d)(1)f. based upon the record keeping specified in Section d)(1). If required, the permittee shall demonstrate compliance with this emission limitation through emission tests conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 25 or 25A.

b. Emissions Limitation:

40.0 pounds per day of OC emissions for each day that photochemically reactive materials are employed.

Applicable Compliance Method:

Compliance shall be determined by the daily values calculated in d)(1)d. based upon the record keeping specified in Section d)(1). If required, the permittee shall demonstrate compliance with this emission limitation through emission tests conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 25 or 25A.

c. Emissions Limitation:

The OC emissions from all the coatings and cleanup materials for this emissions unit shall not exceed 16.8 tons per year, per 12-month summation rolling.

Applicable Compliance Method:

Compliance shall be determined by the record keeping requirements of Section d)(3) of this permit.

d. Emissions Limitation:

Visible particulate emissions from the stack shall not exceed 20% opacity as a six-minute average.

Applicable Compliance Method:

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

e. Emission Limitation:

PE shall not exceed 0.551 lb/hr and 2.41 tons per year from coating operations.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

f. Emission Limitation:

The VOC emissions from this emissions unit shall not exceed 8.09 pounds per hour.

Applicable Compliance Method:

Compliance shall be determined by the potential to emit calculation using a worst case coating content, 5.057 lb VOC/gal, and an application rate of 1.6 gal/hr.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 25 or 25A.

g. Emissions Limitation:

Toluene emissions from this emissions unit shall not exceed 67.2 pounds per day.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum emissions rate of 4.2 pounds per hour of toluene by the daily hours of operation in d)(2) for each day of operation.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 18, 25, 25A, or 40 CFR Part 63, Appendix A Method 320.

(g) Miscellaneous Requirements

(1) None.