



Environmental
Protection Agency

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

6/4/2010

Dennis Derr
M-TEK, INC.
1111 N WARPOLE ST
UPPER SANDUSKY, OH 43351

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0388010052
Permit Number: P0105899
Permit Type: Initial Installation
County: Wyandot

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) |

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, The Daily Cheif-Union. 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, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402

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, Northwest District Office at (419)352-8461.

Sincerely,

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Ohio EPA-NWDO; Michigan; Canada

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
M-TEK, INC.

Issue Date: 6/4/2010

Permit Number: P0105899

Permit Type: Initial Installation

Permit Description: Installation of adhesive coating line (Line 100) consisting of 5 spray booths and 5 electric ovens.

Facility ID: 0388010052

Facility Location: M-TEK, INC.
1111 N WARPOLE ST,
Upper Sandusky, OH 43351

Facility Description: Other Motor Vehicle Electrical and Electronic Equipment 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 Donald Waltermeyer at Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402 or (419)352-8461. 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:

This permit addresses the installation of an adhesive coating line (Line 100) consisting of 5 spray booths and 5 electric ovens.

3. Facility Emissions and Attainment Status:

M-TEK, Inc. has potential emissions of VOC below the Title V major source threshold of 100 tons per year. Wyandot County is designated as attainment for all criteria pollutants. The company has requested synthetic minor limitations on Hazardous Air Pollutants (HAPs) to avoid Title V and MACT.

4. Source Emissions:

M-TEK, Inc. has requested a HAPs limitation of 8.75 tons, per rolling, 12-month period for any individual HAP and 23 tons per rolling, 12-month period for any combination of HAP's for emissions units K001-K009 and P001 combined due to other emissions unit at the facility having HAP emissions.

5. Conclusion:

With federally enforceable restrictions in place for HAP emissions, facility wide HAP emissions will be less than 10 tons for any individual HAP and less than 25 tons for a combination of HAP's making M-TEK a "minor" facility for Title V and MACT.

6. Please provide additional notes or comments as necessary:

None

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

Table with 2 columns: Pollutant, Tons Per Year. Rows include OC (6.33), Individual HAP (8.75), and Combined HAPs (23.00).



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
M-TEK, INC.**

Facility ID: 0388010052
Permit Number: P0105899
Permit Type: Initial Installation
Issued: 6/4/2010
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
M-TEK, INC.

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Authorization

Facility ID: 0388010052

Application Number(s): A0038813, A0039367

Permit Number: P0105899

Permit Description: Installation of adhesive coating line (Line 100) consisting of 5 spray booths and 5 electric ovens.

Permit Type: Initial Installation

Permit Fee: \$200.00 *DO NOT send payment at this time, subject to change before final issuance*

Issue Date: 6/4/2010

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:

M-TEK, INC.
1111 N WARPOLE ST
Upper Sandusky, OH 43351

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

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: P0105899

Permit Description: Installation of adhesive coating line (Line 100) consisting of 5 spray booths and 5 electric ovens.

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

| | |
|-----------------------------------|----------------|
| Emissions Unit ID: | K009 |
| Company Equipment ID: | Line 100 |
| 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 Ohio EPA DAPC, Northwest 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 submitting¹ 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.

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

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).



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. K009, Line 100

Operations, Property and/or Equipment Description:

Line 100, including 5 spray booths and 5 electric ovens.

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)b., b)(1)d., b)(1)g., d)(1), d(4), d)(5), d)(6), d)(7), and d)(8)

(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)h., b)(2)i., d)(3), e)(1), and f)(1)e.

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), as effective 11/30/01 | 36.47 lbs organic compounds (OC)/day & 6.33 tons OC/yr See b)(2)a., b)(2)b., and b)(2)h. |
| b. | OAC rule 3745-31-05 (A)(3)(a)(ii), as effective 12/01/06 | See b)(2)c. |
| c. | OAC rule 3745-17-11 (B) | 0.551 lb particulate emissions (PE)/hr [see b)(2)e.] |
| d. | OAC rule 3745-17-11 (C) | See b)(2)d. and b)(2)e. |
| e. | OAC rule 3745-17-07 (A) | See b)(2)e and b)(2)f. |
| f. | OAC rule 3745-21-07 (G)(2) | See b)(2)g. and c)(1) |
| g. | ORC 3704.03 (F)(3)(c) & (F)(4) | See d)(1) |
| h. | OAC rule 3745-31-05 (D) | Any individual hazardous air pollutant (HAP) shall not exceed 8.75 tons per rolling, 12-month period and total combined HAPs shall not exceed 23.0 tons per rolling, 12-month period from emissions units K001 through K009 and P001, combined. |



| | | |
|--|-------------------------------|---|
| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
| | | See b)(2)i. |

(2) Additional Terms and Conditions

- a. The BAT requirements under OAC rule 3745-31-05(A)(3), effective 11/30/01 have been determined to the following:
 - i. 36.47 lbs OC per day & 6.33 tons OC per year;
 - ii. compliance with OAC rule 3745-17-11(C); and
 - iii. compliance with the requirements established under OAC rule 3745-31-05(D).

b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to 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 ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, the 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 3745-31-05, then the requirements of OAC rule 3745-31-05(A)(3) as effective November 30, 2001 will no longer apply.

c. This rule applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part o the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05 (A)(3) as effective December 1, 2006 do not apply to the OC from this air contaminant source since the uncontrolled potential to emit for OC is less than 10 tons/yr.

The PTE for OC is 6.66 tons per year and was calculated based on the summation of emissions for each adhesive applied in the emissions unit based on the maximum daily application rate for each adhesive (25.41 lbs/day adhesive #1 and 38.74 lbs/day adhesive #2) and maximum organic content by weight for each adhesive (0.48 lb OC/lb adhesive #1 and 0.58 lb OC/lb adhesive #2)

d. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C) pertaining to requirements for controlling particulate emissions from surface coating processes. Paragraph (C) of OAC rule 3745-17-11 shall be 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.

- e. The requirements to comply with OAC rule 3745-17-11 (B) and OAC rule 3745-17-07(A) shall terminate on the date the U.S. EPA approves the requirements based on OAC rule 3745-17-11(C) as a revision to the Ohio SIP for particulate emissions.
- f. Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
- g. 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 requirements of amended OAC rule 3745-21-07 do not apply to emissions units that are installed after February 18, 2008. The following terms and conditions shall become void after U.S. EPA approves the rule revision:
 - c)(1) and d)(2)b.
- h. The daily OC emission limitation of 36.47 lbs/day is based on the emissions unit's potential to emit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance. See f)(1)a. for details on potential to emit calculations.
- i. This permit establishes federally enforceable limitations on emissions of hazardous air pollutants (HAPs) for purposes of avoiding Maximum Achievable Control Technology (MACT) regulations and Title V permitting requirements.

Annual HAP emissions from emissions units K001 through K009 and P001, combined, shall not exceed 8.75 tons per year for any individual HAP and 23.0 tons per year for total combined HAPs, based on a rolling, 12-month summation of the monthly HAP emissions.

Federally enforceable limitations of 8.75 tons of any individual HAP and 24 tons of any combination of HAPs per rolling, 12-month period were initially established in a permit issued on November 17, 2009 and as such the facility has existing records of HAP emissions in lieu of establishing monthly HAP emissions restrictions for the first year of operation.

c) Operational Restrictions

- (1) The use of any photochemically reactive material, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.

d) Monitoring and/or Recordkeeping Requirements

- (1) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute" ORC 3704.03 (F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be

less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified PTIO/FEPTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO/FEPTIO.

- (2) The permittee shall collect and record the following information each month for this emissions unit:
- a. the name and identification for each coating (adhesive) employed;
 - b. documentation on whether or not each coating (adhesive) employed is a photochemically reactive material;
 - c. the OC content of each coating (adhesive) employed, in percent by weight;
 - d. the coating (adhesive) usage, in lbs/month
 - e. the OC emissions rate for each coating (adhesive) employed, in lbs/month [d)(2)c. times d)(2)d.]
 - f. the total monthly OC emissions rate for all coatings (adhesives) employed, in tons [summation of d)(2)e. for all adhesives times 1 ton/2000 lbs); and
 - g. the annual, year-to-date OC emission rate for all coatings employed, in tons (summation of d)(2)f. for each calendar month to date from January to December), in tons.
- (3) The permittee shall collect and record the following HAP information each month for emissions units K001 through K009 and P001, combined:
- a. the company identification of each HAP-containing material;
 - b. the amount of each individual HAP in each HAP-containing material in lbs/gallon, as applied and/or by % weight;
 - c. the number of gallons and/or pounds of each HAP-containing material employed;
 - d. the total controlled emission rate for each individual HAP from each HAP-containing material employed in emissions units K001 through K006 and the emission rate for each individual HAP from each HAP-containing material employed in emissions units K007 through K009, and P001, for each individual HAP, in lbs/month;
 - e. the total emission rate for each individual HAP from all HAP-containing materials employed [summation of section d)(3)d. for each individual HAP], in lbs/month;
 - f. the total HAP emission rate for all HAPs combined from all HAP-containing materials employed [summation of section d)(3)e. for all HAPs], in lbs/month; and

- g. the annual emissions of each individual HAP and all HAPs combined, based upon a rolling, 12-month summation of monthly emissions.

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

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

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

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

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 and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. 8.75 tons per rolling, 12-month period for any individual HAP for emissions units K001 through K009 and P001, combined; and
 - ii. 23.00 tons per rolling, 12-month period for any combination of HAPs for emissions units K001 through K009 and P001, combined.
 - 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, April 30, July 31, and October 31, and shall cover the previous calendar quarters unless an alternative schedule has been established and approved by the Director (Ohio EPA, Northwest District Office).

- (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.
- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

- (1) Compliance with the emission limitations(s) in Section b)(1) of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
36.47 lbs OC/day

Applicable Compliance Method:

The daily OC emission limitation is based on the emissions unit's potential to emit.* Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this unit is based on the summation of the maximum daily application rate for each adhesive (25.41 lbs/day adhesive #1 and 38.74 lbs/day adhesive #2) and the maximum organic content by weight for each adhesive (0.48 lb OC/lb adhesive #1 and 0.58 lb OC/lb adhesive #2)

b. Emission Limitation:

6.33 tons OC/yr

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements in section d)(2) of this permit.

c. Emission Limitation:

0.551 lb PE /hr

Applicable Compliance Method:

The permittee may calculate actual PE rate from the unit utilizing the following equation:

$$E = (\text{maximum coating solids usage rate}) \times (1-TE) \times (1-CE)$$

where:

E = PE rate (pounds/hour).

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

CE = Control efficiency of the control equipment (filters).

If required, compliance with the hourly PE limitation shall be determined in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

d. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required compliance shall be determined in accordance with OAC rule 3745-17-03(B)(1).

Emission Limitations:

8.75 tons per rolling, 12-month period for any individual HAP and 23.00 tons per rolling, 12-month period for any combination of HAPs for emissions units K001-K009 and P001, combined.



Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section d)(3) of this permit.

g) Miscellaneous Requirements

- (1) None.