Ohio Environmental Protection Agency

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

6/10/2010

Certified Mail

Yes	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

Charles Baumgartner
Pilkington North America Inc
140 Dixie Highway
Rossford, OH 43460-1215

RE: FINAL AIR POLLUTION PERMIT-TO-INSTAI
Facility ID: 0487010012
Permit Number: P0106111
Permit Type: Initial Installation
County: Wood

Dear Permit Holder:

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

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to “Ohio Treasurer Kevin Boyce," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General’s Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Toledo Department of Environmental Services. 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.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA
Ohio EPA-NWDO; Michigan; Indiana; Canada

50 West Town Street, Suite 700
P.O. Box 1049
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Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install
for
Pilkington North America Inc

Facility ID:	0487010012
Permit Number:	P0106111
Permit Type:	Initial Installation
Issued:	6/10/2010
Effective:	6/10/2010

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install
for
Pilkington North America Inc

Table of Contents

Authorization 1
A. Standard Terms and Conditions 3
1. Federally Enforceable Standard Terms and Conditions 4
2. Severability Clause 4
3. General Requirements 4
4. Monitoring and Related Record Keeping and Reporting Requirements 5
5. Scheduled Maintenance/Malfunction Reporting 6
6. Compliance Requirements 6
7. Best Available Technology 7
8. Air Pollution Nuisance 7
9. Reporting Requirements 7
10. Applicability 8
11. Construction of New Sources(s) and Authorization to Install 8
12. Permit-To-Operate Application 9
13. Construction Compliance Certification 9
14. Public Disclosure 10
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations 10
16. Fees 10
17. Permit Transfers 10
18. Risk Management Plans 10
19. Title IV Provisions 10
B. Facility-Wide Terms and Conditions 11
C. Emissions Unit Terms and Conditions 13
1. K001, OE FAB RIM Area Operations 14
2. K002, OE FAB Assembly Area 22

Authorization

Facility ID: 0487010012
Facility Description: The facility manufactures float glass for industrial purposes and the automobile industry.
Application Number(s): A0039234
Permit Number: P0106111
Permit Description: This permit is for the installation of equipment for two emission units. Emissions unit K001 is for the Reaction Injection Molding (RIM) area which includes the RIM clamps, mini-clamps and RIM tools and associated priming stations and mold release application stations. Emissions Unit K002 is the Assembly Area and consists of glass and hardware priming, adhesion and assembly stations.
Permit Type: Initial Installation
Permit Fee: $400.00
Issue Date: 6/10/2010
Effective Date: 6/10/2010

This document constitutes issuance to:

Pilkington North America Inc
140 Dixie Highway
Rossford, OH 43460-1215

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

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

Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604
(419)936-3015

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Authorization (continued)

Permit Number: P0106111
Permit Description: This permit is for the installation of equipment for two emission units. Emissions unit K001 is for the Reaction Injection Molding (RIM) area which includes the RIM clamps, mini-clamps and RIM tools and associated priming stations and mold release application stations. Emissions Unit K002 is the Assembly Area and consists of glass and hardware priming, adhesion and assembly stations.

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

Emissions Unit ID:	**K001**
Company Equipment ID:	OE FAB RIM Area Operations
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K002**
Company Equipment ID:	OE FAB Assembly Area
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A.2.a), Severability Clause

(2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements

(3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements

(4) Standard Term and Condition A.9., Reporting Requirements

(5) Standard Term and Condition A.10., Applicability

(6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install

(7) Standard Term and Condition A.14., Public Disclosure

(8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(9) Standard Term and Condition A.16., Fees

(10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

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

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

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

c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

(1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Toledo Department of Environmental Services.

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

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

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

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

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Toledo Department of Environmental Services in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.
Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

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

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

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

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

d) The permittee shall submit progress reports to the Toledo Department of Environmental Services concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

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

8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Toledo Department of Environmental Services.

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

10. Applicability

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

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

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

b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" 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).

d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

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

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

12. Permit-To-Operate Application

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

13. Construction Compliance Certification

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

a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.

b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

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

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

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

16. Fees

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

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the “Owner/Contact Change” functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

18. Risk Management Plans

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

19. Title IV Provisions

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

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

C. Emissions Unit Terms and Conditions

1. K001, OE FAB RIM Area Operations

Operations, Property and/or Equipment Description:

OE FAB RIM Area Operations: Equipment consists of reaction injection molding (RIM) clamps, mini-clamps and RIM tools; associated priming stations and mold release application operations. All stations are vented through a common stack equipped with a 25,000 cfm blower.

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

(1) d)(4), d)(5) and d)(6)

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 shall not exceed 2.68 lbs/hr See b)(2)b. and b)(2)c.
When applying coatings to non-metallic surface:		
b.	OAC rule 3745-21-07(G)(2) and (4)	For all mold release, glass primers and photochemically reactive cleaning solvents: 8 pounds of organic compounds (OC) per hour and 40 pounds of OC per day. See b)(2)a.
When applying coatings to miscellaneous metal surfaces:		
c.	OAC rule 3745-21-09(U)(2)(e)(iii)	For any miscellaneous metal parts or products coating line: VOC emission exemption, based on maximum daily coating usage not exceeding 10 gallons of coating in any one day

(2) Additional Terms and Conditions

a. 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: b)(1)b., d)(2), e)(2), f)(1)b.

b. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(2)(e)(iii) when coating metallic parts.

c. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) when coating nonmetallic parts.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) [Recordkeeping required for OAC rule 3745-31-05(A)(3)]
The permittee shall collect and record the following information monthly for the purpose of determining compliance with the VOC emissions limitations:

a. the name and identification number of each primer, mold release and photochemically reactive cleanup material employed;

b. the total number of gallons of each primer, mold release and photochemically reactive cleanup material employed;

c. the VOC content of each primer, mold release and photochemically reactive cleanup materials, inlbs/gal;

d. the total organic compound emission rate for all primers, mold release and photochemically reactive cleanup materials, in lbs/month;

e. the total number of hours that this emissions unit was in operation, in hours/month; and

f. the hourly volatile organic compound emission rate for the primers, mold release and photochemically reactive cleanup materials, i.e., d./e, in lbs/hr (average).

(2) [Recordkeeping required for OAC rule 3745-21-07(G)(2)]
The permittee shall collect and record the following information for each day for the coating operations to non-metallic surfaces:

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. the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;

e. the total number of hours the emissions unit was in operation; and

f. 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).]

(3) [Recordkeeping required for OAC rule 3745-21-09(U)(2)(e)(iii)]
The permittee shall collect and record the following information each day for the coatings of miscellaneous metal surfaces:

a. The name and identification number of each coating employed;

b. The volume, in gallons, of each coating employed; and

c. The total volume, in gallons, of all the coatings employed.

(4) [Air Toxics Policy]
The permit-to-install (PTI) application for this emissions unit, K001, was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this emissions unit for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for

Chemical Substances and Physical Agents Biological Exposure Indices"; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "**X**" hours per day and "**Y**" 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 x 8/X x 5/Y = 4 TLV/XY = MAGLC

where; X = 24 and Y = 7

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

Toxic Contaminant: Methanol

TLV: 200 ppm, 262.09 mg/m^3

Maximum Hourly Emission Rate (lbs/hr): 0.35

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 10.25

MAGLC (ug/m^3): 6240.14

Toxic Contaminant: Toluene

TLV: 50 ppm, 188.4 mg/m^3

Maximum Hourly Emission Rate (lbs/hr): 0.42

Predicted 1-Hour Maximum Ground Level Concentration (ug/m^3): 13.58

MAGLC (ug/m^3): 4485.83

(5) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can

affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

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

If the permittee determines that the “Toxic Air Contaminant Statute” will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a “modification”, the permittee shall apply for and obtain a final 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.

(6) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

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

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that includes the identification of each month during which the average hourly volatile organic compound emissions from the primers, mold release and photochemically reactive cleanup materials exceeds the applicable VOC emissions limitation.

(2) The permittee shall submit quarterly deviation (excursion) reports that include the following information:

a. an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and

b. an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

The quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

[OAC rule 3745-21-07(G)(2)]

(3) The permittee shall notify the local air agency (Toledo Division of Environmental Services) in writing of any daily record showing that the coatings of miscellaneous metal surfaces employs more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the local air agency within 45 days after the exceedance occurs.

[OAC rule 3745-21-09(U)(2)(e)(iii)]

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. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 2.68 lbs/hr

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d)(1).

To determine the worst case volatile organic compound (VOC) emissions rate, the following assumptions were used:

Process	Product	Max. Usage (gal/hr)	VOC Content (lbs/gal)	Emission Rate (lbs/hr)
Primer	43518 Glass Primer	0.08	6.94	0.555
	43520A Glass Primer	0.02	4.82	0.096
	43521 Hardware Primer	0.02	6.89	0.138
	43527 Glass Primer	0.06	4.79	0.287
	43532 Hardware Primer	0.0003	4.65	0.014
Mold Release	RimLease8	0.31	2.84	0.880
	PRC 7118	0.05	5.11	0.256
Solvents	Isopropyl Alcohol	0.06	6.5	0.390
	Methyl Ethyl Ketone	0.01	6.75	0.068
	TOTAL			**2.68**

b. Emission Limitation:

For all mold release, glass primers and photochemically reactive cleaning solvents: 8 pounds of organic compounds (OC) per hour and 40 pounds of OC per day

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d)(2). If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule 3745-21-10(B) using the methods and procedures specified in USEPA Reference Method 24 of 40 CFR Part 60, Appendix A.

c. Emission Limitation:

For any miscellaneous metal parts or products coating line: VOC emission exemption, based on maximum daily coating usage not exceeding 10 gallons of coating in any one day

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d)(3).

g) Miscellaneous Requirements

(1) None.

2. K002, OE FAB Assembly Area

Operations, Property and/or Equipment Description:

Automotive Glass Products - Priming, adhesive and value-added assembly stations with an exhaust/ventilation system equipped with a 7,500 cfm blower

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

(1) 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), as effective 11/30/01	Volatile organic compound (VOC) emissions shall not exceed 1.55 lbs/hr and 6.79 tons per year See b)(2)b. and b)(2)c.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)d.
When applying coatings to non-metallic surface:		
c.	OAC rule 3745-21-07(G)(2) and (4)	For all adhesives, glass primers and photochemically reactive cleaning solvents: 8 pounds of organic compounds (OC) per hour and 40 pounds of OC per day. See b)(2)a.

(2) Additional Terms and Conditions

a. 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: b)(1)b., d)(2), e)(2), f)(1)b.

b. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) when coating nonmetallic parts.

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 and the following no longer apply: b)(1)a., b)(2)d., d)(1), e)(1) and f)(1)a. and b.

d. The requirements of OAC rule 3745-31-05(A)(3)(a)(ii) applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan. Therefore, the BAT requirements under OAC rule 3745-31-05 (A)(3)(a) do not apply to the VOC emissions since the uncontrolled potential to emit (PTE) for VOC is less than ten tons per year.

The PTE from the emissions is 6.79 tons of VOC. Potential emissions were determined by multiplying each adhesive, glass primer and photochemically reactive cleaning solvent maximum hourly usage (gal/hr) multiplied by the VOC content (lbs/gal) and then multiplying by 8,760 hours per year and dividing by 2,000 tons per year. Listed below are the maximum usage rates and maximum VOC content of material used as reported by the permittee:

Process	Product	Max. Usage (gal/hr)	VOC Content (lbs/gal)
Primer	RC-50KE Glass Primer	0.1	6.4
Primer	MS-90 Glass Primer	0.1	6.4
Adhesive	WS-70FK Adhesive	0.5	0.15
Cleanup Solvents	Isopropyl Alcohol	0.03	6.56

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) [Recordkeeping required for OAC rule 3745-31-05(A)(3)]
The permittee shall collect and record the following information monthly for the purpose of determining compliance with the VOC emissions limitations:

a. the name and identification number of each primer, adhesive and photochemically reactive cleanup material employed;

b. the total number of gallons of each primer, adhesive and photochemically reactive cleanup material employed;

c. the VOC content of each primer, adhesive and photochemically reactive cleanup materials, in lbs/gal;

d. the total organic compound emission rate for all primers, adhesive and photochemically reactive cleanup materials, in lbs/month;

e. the total number of hours that this emissions unit was in operation, in hours/month; and

f. the hourly volatile organic compound emission rate for the primers, adhesives and photochemically reactive cleanup materials, i.e., d./e, in lbs/hr (average).

(2) [Recordkeeping required for OAC rule 3745-21-07(G)(2)]
The permittee shall collect and record the following information for each day for the coating operations to non-metallic surfaces:

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. the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;

e. the total number of hours the emissions unit was in operation; and

f. 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).]

(3) Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan, then the following recordkeeping requirements apply to verify that VOC emissions are less than 10 tons per year.

The permittee shall collect and record the following information monthly for the purpose of determining compliance with the VOC emissions limitations:

a. the name and identification number of each primer, adhesive and photochemically reactive cleanup material employed;

b. the total number of gallons of each primer, adhesive and photochemically reactive cleanup material employed;

c. the VOC content of each primer, adhesive and photochemically reactive cleanup materials, in lbs/gal; and

d. the total organic compound emission rate for all primers, adhesive and photochemically reactive cleanup materials, in lbs/month.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that includes the identification of each day during which the average hourly volatile organic compound emissions from the primers, adhesives and photochemically reactive cleanup materials exceeds the applicable VOC emissions limitation.

(2) The permittee shall submit quarterly deviation (excursion) reports that include the following information:

a. an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and

b. an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

The quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

[OAC rule 3745-21-07(G)(2)]

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. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 1.55 lbs/hr

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d)1.

To determine the worst case volatile organic compound (VOC) emissions rate, the following assumptions were used:

Process	Product	Max. Usage (gal/hr)	VOC Content (lbs/gal)	Emission Rate (lbs/hr)
Primer	RC-50KE Glass Primer	0.1	6.4	0.640
Primer	MS-90 Glass Primer	0.1	6.4	0.640
Adhesive	WS-70FK Adhesive	0.5	0.15	0.075
Cleanup Solvents	Isopropyl Alcohol	0.03	6.56	0.195
	TOTAL			**1.55**

b. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 6.79 tons per year

Applicable Compliance Method:

The annual emission limitation was developed by multiplying the short-term limit of 1.55 lb/hr of VOC by 8,760 hours and dividing by 2,000 pounds per ton. Therefore, provided that compliance is shown with the pound per hour VOC emission limitation, then compliance with the annual emission limitation shall be assumed.

c. Emission Limitation:

For all mold release, glass primers and photochemically reactive cleaning solvents: 8 pounds of organic compounds (OC) per hour and 40 pounds of OC per day

Applicable Compliance Method:

Compliance shall be determined through the monitoring and record keeping requirements of d)(2). If required, compliance shall be demonstrated by an evaluation performed in accordance with OAC rule 3745-21-10(B) using the

methods and procedures specified in USEPA Reference Method 24 of 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

(1) None.