

Synthetic Minor Determination and/or **Netting Determination**

Permit To Install **01-12001**

A. Source Description

London Industries, Inc. operates a plastic parts coating facility in London, Madison County, non-attainment for ozone. The facility is currently a Synthetic Minor Stationary Source pursuant to Title V operating permit requirements for criteria pollutants and HAPs. London Industries, Inc. proposes a facility-wide VOC and HAP emission limitation, to limit potential to emit, to remain non-Title V and avoid non-attainment review. They have proposed to limit their coating and clean up usages, in order to remain a Synthetic Minor and avoid non-attainment review.

B. Facility Emissions and Attainment Status

London Industries is currently classified as a Synthetic Minor Stationary Source pursuant to Title V operating permit requirements for all criteria pollutants and HAP(s). Madison County is in attainment for all criteria pollutants except ozone.

C. Source Emissions

Potential emissions of Hexane, single HAP, from all emissions units after the new adhesive is utilized and without any federally enforceable restrictions are 66.5 tons per year. Limiting the number of gallons of coating applied in emission units R005, R006, R007, R008, R009, and R010 will limit Hexane emissions from these emission units to 9.9 tons per rolling, 12-month summation. There are no other HAP contributing emission units at this facility.

Potential emissions of combined HAPs from all emissions units after the new units are installed and without any federally enforceable restrictions are 128.0 tons per year. Limiting the number of gallons of coating applied in emissions R005, R006, R007, R008, R009, and R010 will limit combined HAP emissions from these emission units to 19.0 tons per rolling, 12-month summation. There are no other HAP contributing emission units at this facility.

Potential emissions of VOC from all emissions units after the new units are installed and without any federally enforceable restrictions are 451 tons per year. Limiting the number of gallons of coating applied in emissions R005, R006, R007, R008, R009, and R010 will limit VOC emissions from these emission units to 68.3 tons per rolling, 12-month summation. There are no other VOC contributing emission units at this facility.

D. Conclusion

London Industries will remain a Synthetic Minor facility and avoid non-attainment review by means of limiting the number of gallons of coating applied, effectively restricting the facility PTE for a single HAP, combined HAP, and VOC to below Major Stationary Source Title V operating permit requirement threshold levels. Monthly monitoring, record keeping and calculations, along with and quarterly deviation reports for emission units R005, R006, R007, R008, R009, and R010, will be required to monitor compliance. Since allowable emissions are below Major Stationary Source Title V operating permit requirements threshold levels, this facility will remain a minor source



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
MADISON COUNTY**

CERTIFIED MAIL

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov.
Center

Application No: 01-12001

Fac ID: 0149010100

DATE: 1/10/2006

London Industries
Scott Ford
350 E High St
London, OH 43140

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on 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 proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$1200** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

CDO

**MADISON
COUNTY**

**PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL 01-12001 FOR AN AIR CONTAMINANT SOURCE FOR
London Industries**

On 1/10/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **London Industries**, located at **350 E High St, London, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 01-12001:

Modification of R005, R006, R007, R008, R009 and R010 to increase adhesive usage.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Isaac Robinson, Ohio EPA, Central District Office, 3232 Alum Creek Drive, Columbus, OH 43207-3417
[(614)728-3778]



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 01-12001

Application Number: 01-12001
Facility ID: 0149010100
Permit Fee: **To be entered upon final issuance**
Name of Facility: London Industries
Person to Contact: Scott Ford
Address: 350 E High St
London, OH 43140

Location of proposed air contaminant source(s) [emissions unit(s)]:
**350 E High St
London, Ohio**

Description of proposed emissions unit(s):
Modification of R005, R006, R007, R008, R009 and R010 to increase adhesive usage.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections,

London Industries

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conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental

London Industries**Facility ID: 0149010100****PTI Application: 01-12001****Issued: To be entered upon final issuance**

Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

10. Public Disclosure

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

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

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

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

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This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this

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PTI A**

Emissions Unit ID: **R005**

Issued: To be entered upon final issuance

permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	68.3
PE	5.4
Individual HAP	9.9
Combined HAP	24.9

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PTI A

Emissions Unit ID: R005

Issued: To be entered upon final issuance

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
R005 - Adhesive Line No. 1 with Electric Oven (Terms in this permit supercede those identified in PTI 01-08878 issued 5/17/2005)	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-07(G)(2)
	OAC rule 3745-31-05(C)	OAC rule 3745-17-11(B)(1)
		OAC rule 3745-17-07(A)(1)

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PTI A

Emissions Unit ID: **R005**

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<p>Applicable Emissions <u>Limitations/Control</u> <u>Measures</u></p>	<p>from all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010.</p>
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<p>Volatile organic compound (VOC) emissions shall not exceed 17.1 lbs/hr.</p>	<p>See Sections B.2, B.3, and B.4 below.</p>
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See Sections A.2.b below.

<p>Particulate emissions (PE) shall not exceed 0.2 lb/hr and 0.9 ton/year.</p>	<p>The hourly PE limitation established by this rule is less stringent than that established</p>
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<p>See Sections A.2.a below.</p>	<p>pursuant to OAC rule 3745-31-05(A)(3).</p>
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<p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-05(C)</p>	<p>Visible PE from any stack shall not exceed 20% opacity, as a six-minute average, except as provided by rule.</p>
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The combined total VOC emissions shall not exceed 68.3 tons per rolling 12-month period for all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010.

The combined total hazardous air pollutants (HAP) emissions shall not exceed 9.9 tons per rolling 12-month period for all single HAP and 24.9 tons per rolling 12-month period for all HAP

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

2.a The hourly VOC limitation and the hourly and annual PE limitations were established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with these limits.

2.b To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G), no photochemically reactive materials (i.e., as raw materials or cleanup materials) shall be employed in this emissions unit.

Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).

B. Operational Restrictions

1. The permittee shall vent all emissions through the dry filtration system whenever this emissions unit is in operation.
2. The maximum annual coating usage for emissions units R005, R006, R007, R008, R009 and R010 shall not exceed 23,400 gallons, based upon a rolling, 12-month summation of the coating usage figures.
3. Coating content may not exceed 5.69 pounds VOC per gallon. Cleanup content may not exceed 6.82 pounds VOC per gallon.
4. The maximum annual clean up usage for emissions units R005, R006, R007, R008, R009 and R010 shall not exceed 500 gallons, based upon a rolling, 12-month summation of the coating usage figures.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the coating operation:

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- a. the name and identification number of each coating and cleanup material, as applied;
- b. the number of gallons of each coating employed;
- c. the number of gallons of each cleanup material employed;
- d. the VOC content of each coating, in pounds of VOC per gallon of coating, excluding water and exempt solvents; and
- e. the VOC content of each cleanup material, in pounds of VOC per gallon of cleanup, excluding water and exempt solvents.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. The permittee shall maintain monthly records of the following information:
 - a. the monthly VOC emission rate for all coatings and cleanup materials combined, calculated by summing the calculated emission rate of each coating and cleanup material, i.e., $[(C.1.b)(C.1.d)+(C.1.c)(C.1.e)]/(2000 \text{ lbs/ton})$, in tons;
 - b. the rolling, 12-month summation of the VOC emission rate for all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010, in tons;
 - c. the rolling, 12-month summation of the coating and cleanup materials usage for all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010, in gallons.
 - d. the individual HAP¹ content of each HAP for each coating and cleanup materials in pounds of individual HAP per gallon, as applied;
 - e. the total combined HAP content of each coating and cleanup materials in pounds of combined HAPs per gallon, as applied (sum of all individual HAP contents from d);
 - f. the total individual HAP emissions for each HAP from all coating and cleanup material in pounds or tons per rolling, 12-month period (for each HAP the sum of the individual HAP¹ content of each HAP for each coating in term C.2.d times

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Emissions Unit ID: R005

term C.1.b for each coating and the sum of the individual HAP¹ content of each HAP for each cleanup material in term C.2.d times term C.1.c for each cleanup material); and

- g. the total combined HAP emissions from all coating and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of the total combined HAP content for all coatings in term C.2.e times term C.1.b for

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each coating and plus the sum of the total combined HAP content for all cleanup materials in term C.2.e times term C.1.c for each cleanup material).

¹A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

3. 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.
4. The permit to install for emissions unit R005 is evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: n-Hexane

TLV (mg/m³): 176

Maximum Hourly Emission Rate (lbs/hr): 2.53

Predicted 1-Hour Maximum Ground-Level Concentration at the Fenceline (ug/m³): 336.5

MAGLC (ug/m³): 4196

5. Physical changes to or changes in the method of operation of these emissions units after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most

Emissions Unit ID: R005

recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

6. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.
2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

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- a. an identification of each hour which the hourly VOC emission rate from the coatings and cleanup materials exceeded 17.1 lbs/hr, and the actual hourly VOC emission rate for each such hour;
- b. the VOC content limit for coating materials;
- c. the VOC content limit for cleanup materials;
- d. the rolling, 12-month coating usage limitation;
- e. the rolling, 12-month cleanup usage limitation;
- f. the rolling, 12-month total individual HAP emission limitation;
- g. the rolling, 12-month total combined HAP emissions limitation; and
- h. the rolling, 12-month total VOC emission limitation.

These quarterly deviation (excursion) reports shall be submitted as described in the General Terms and Conditions

3. The permittee shall submit annual reports which specify the VOC, individual HAP and total combined HAP emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

E. Testing Requirements

1. Compliance with the emission limitations of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
VOC emissions shall not exceed 17.1 lbs/hr.

Applicable Compliance Method:
Compliance shall be determined by the record keeping performed pursuant to Section C.1 of this permit.
 - b. Emission Limitation:

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PTI A

Emissions Unit ID: **R005**

Issued: To be entered upon final issuance

The combined total VOC emissions shall not exceed 68.3 tons per rolling 12-month period for all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010.

Applicable Compliance Method:

Compliance shall be based upon the summation of the daily VOC emissions per the record keeping requirements specified in Section C.2 of this permit.

c. Emission Limitation:

The individual HAP emissions shall not exceed 9.9 tons per rolling 12-month period for all single HAP from all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.2 of this permit.

- d. Emission Limitation:
 The combined total HAP emissions shall not exceed 24.9 tons per rolling 12-month period for all HAP from all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.2 of this permit.

- e. Emission Limitation:
 PE shall not exceed 0.2 lb/hr.

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation may be used:

$$E = (\text{maximum coating solids usage rate in pounds per hour}) (1-TE) (1-CE)$$

$$E = \text{particulate emissions rate (lbs/hr)}$$

$$TE = \text{transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (75\% for the automated adhesive coating line)}$$

$$CE = \text{fractional control efficiency of the control equipment (87.5\% for dry filtration system)}$$

If required, the permittee shall demonstrate compliance with this emission limitation through emissions tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(10).

- f. Emission Limitation:
 PE emissions shall not exceed 0.9 ton/year.

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly limitation by 8,760 hours/year and then dividing by 2,000 pounds/ton. Compliance with the annual emission limitation may be assumed as long as compliance with the hourly

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PTI A

Emissions Unit ID: **R005**

Issued: To be entered upon final issuance

emission limitation is maintained.

- g. Emission Limitation:
Visible PE from any stack shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

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PTI A

Emissions Unit ID: **R005**

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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).

- h. USEPA Method 24 shall be used to determine the VOC contents for the coatings and cleanup materials. If an owner or operator determines that Method 24, 40 CFR Part 60, Appendix A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

F. Miscellaneous Requirements

None

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PTI A

Emissions Unit ID: R006

Issued: To be entered upon final issuance

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
R006 - Adhesive Line No. 2 with Electric Oven (Terms in this permit supercede those identified in PTI 01-08878 issued 5/17/2005)	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-11(B)(1)
		OAC rule 3745-17-07(A)(1)
	OAC rule 3745-31-05(C)	
	OAC rule 3745-21-07(G)(2)	

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Emissions Unit ID: **R006**

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Applicable Emissions
Limitations/Control
Measures

month period for all HAP from all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010.

Volatile organic compound (VOC) emissions shall not exceed 17.1 lbs/hr.

See Sections B.2, B.3, and B.4 below.

See Sections A.2.b below.

Particulate emissions (PE) shall not exceed 0.2 lb/hr and 0.9 ton/year.

The hourly PE limitation established by this rule is less stringent than that established

See Sections A.2.a below.

pursuant to OAC rule 3745-31-05(A)(3).

The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-05(C)

Visible PE from any stack shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

The combined total VOC emissions shall not exceed 68.3 tons per rolling 12-month period for all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010.

The combined total hazardous air pollutants (HAP) emissions shall not exceed 9.9 tons per rolling 12-month period for all single HAP and 24.9 tons per rolling 12-

2. Additional Terms and Conditions

- 2.a** The hourly VOC limitation and the hourly and annual PE limitations were established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with these limits.
- 2.b** To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G), no photochemically reactive materials (i.e., as raw materials or cleanup materials) shall be employed in this emissions unit.

Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).

B. Operational Restrictions

1. The permittee shall vent all emissions through the dry filtration system whenever this emissions unit is in operation.
2. The maximum annual coating usage for emissions units R005, R006, R007, R008, R009 and R010 shall not exceed 23,400 gallons, based upon a rolling, 12-month summation of the coating usage figures.
3. Coating content may not exceed 5.69 pounds VOC per gallon. Cleanup content may not exceed 6.82 pounds VOC per gallon.
4. The maximum annual clean up usage for emissions units R005, R006, R007, R008, R009 and R010 shall not exceed 500 gallons, based upon a rolling, 12-month summation of the coating usage figures.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the coating operation:

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- a. the name and identification number of each coating and cleanup material, as applied;
- b. the number of gallons of each coating employed;
- c. the number of gallons of each cleanup material employed;
- d. the VOC content of each coating, in pounds of VOC per gallon of coating, excluding water and exempt solvents; and
- e. the VOC content of each cleanup material, in pounds of VOC per gallon of cleanup, excluding water and exempt solvents.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. The permittee shall maintain monthly records of the following information:
 - a. the monthly VOC emission rate for all coatings and cleanup materials combined, calculated by summing the calculated emission rate of each coating and cleanup material, i.e., $[(C.1.b)(C.1.d)+(C.1.c)(C.1.e)]/(2000 \text{ lbs/ton})$, in tons;
 - b. the rolling, 12-month summation of the VOC emission rate for all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010, in tons;
 - c. the rolling, 12-month summation of the coating and cleanup materials usage for all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010, in gallons.
 - d. the individual HAP¹ content of each HAP for each coating and cleanup materials in pounds of individual HAP per gallon, as applied;
 - e. the total combined HAP content of each coating and cleanup materials in pounds of combined HAPs per gallon, as applied (sum of all individual HAP contents from e);
 - f. the total individual HAP emissions for each HAP from all coating and cleanup material in pounds or tons per rolling, 12-month period (for each HAP the sum of the individual HAP¹ content of each HAP for each coating in term C.2.d times term C.1.b for each coating and the sum of the individual HAP¹ content of each

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HAP for each cleanup material in term C.2.d times term C.1.c for each cleanup material); and

- g. the total combined HAP emissions from all coating and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of the total combined HAP content for all coatings in term C.2.e times term C.1.b for each coating and plus the sum of the total combined HAP content for all cleanup materials in term C.2.e times term C.1.c for each cleanup material).

¹A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

- 3. 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.
- 4. The permit to install for emissions unit R006 is evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: n-Hexane

TLV (mg/m³): 176

Maximum Hourly Emission Rate (lbs/hr): 2.53

Predicted 1-Hour Maximum Ground-Level Concentration at the Fenceline (ug/m³): 336.5

MAGLC (ug/m³): 4196

- 5. Physical changes to or changes in the method of operation of these emissions units after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to

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determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

6. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.
2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. an identification of each hour during which the hourly VOC emission rate from the coatings and cleanup materials exceeded 17.1 lbs/hr, and the actual hourly VOC emission rate for each such hour.

- b. the VOC content limit for coating materials;
- c. the VOC content limit for cleanup materials;
- d. the rolling, 12-month coating usage limitation;
- e. the rolling, 12-month cleanup usage limitation;
- f. the rolling, 12-month total individual HAP emission limitation;
- g. the rolling, 12-month total combined HAP emissions limitation; and
- h. the rolling, 12-month total VOC emission limitation.

These quarterly deviation (excursion) reports shall be submitted as described in the General Terms and Conditions.

3. The permittee shall submit annual reports which specify the VOC, individual HAP and total combined HAP emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

E. Testing Requirements

1. Compliance with the emission limitations of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
VOC emissions shall not exceed 17.1 lbs/hr.

Applicable Compliance Method:
Compliance shall be determined by the record keeping performed pursuant to Section C.1 of this permit.
 - b. Emission Limitation:
The combined total VOC emissions shall not exceed 68.3 tons per rolling 12-month period for all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010.

Applicable Compliance Method:

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Compliance shall be based upon the summation of the daily VOC emissions per the record keeping requirements specified in Section C.2 of this permit.

c. Emission Limitation:

The individual HAP emissions shall not exceed 9.9 tons per rolling 12-month period for all single HAP from all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.2 of this permit.

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- d. Emission Limitation:
The combined total HAP emissions shall not exceed 24.9 tons per rolling 12-month period for all HAP from all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.2 of this permit.

- e. Emission Limitation:
PE shall not exceed 0.2 lb/hr.

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation may be used:

$$E = (\text{maximum coating solids usage rate in pounds per hour}) (1-TE) (1-CE)$$

$$E = \text{particulate emissions rate (lbs/hr)}$$

$$TE = \text{transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (75\% for the automated adhesive coating line)}$$

$$CE = \text{fractional control efficiency of the control equipment (87.5\% for dry filtration system)}$$

If required, the permittee shall demonstrate compliance with this emission limitation through emissions tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(10).

- f. Emission Limitation:
PE emissions shall not exceed 0.9 ton/year.

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly limitation by 8,760 hours/year and then dividing by 2,000 pounds/ton. Compliance with the annual emission limitation may be assumed as long as

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compliance with the hourly emission limitation is maintained.

- g. **Emission Limitation:**
Visible PE from any stack shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

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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).

- h. USEPA Method 24 shall be used to determine the VOC contents for the coatings and cleanup materials. If an owner or operator determines that Method 24, 40 CFR Part 60, Appendix A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

F. Miscellaneous Requirements

None

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Emissions Unit ID: **R007**

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
R007 - Honda adhesive coating line No. 1 with two spray booths and one IR Oven (Terms in this permit supercede those identified in PTI 01-08878 issued 5/17/2005)	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-11(B)(1)
		OAC rule 3745-17-07(A)(1)
	OAC rule 3745-31-05(C)	
	OAC rule 3745-21-07(G)(2)	

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Applicable Emissions from all coatings and cleanup
Limitations/Control materials used in units R005,
Measures R006, R007, R008, R009 and
R010.

Volatile organic
compound (VOC) See Sections B.2, B.3, and B.4
emissions shall not below.
exceed 17.1 lbs/hr.

See Sections A.2.b below.

Particulate emissions
(PE) shall not exceed 0.2 The hourly PE limitation
lb/hr and 0.9 ton/year. established by this rule is less
stringent than that established

See Sections A.2.a pursuant to OAC rule 3745-31-
below. 05(A)(3).

The requirements of this Visible PE from any stack shall
rule also include not exceed 20% opacity, as a six-
compliance with the minute average, except as
requirements of OAC provided by rule.
rules 3745-17-07(A)(1)
and 3745-31-05(C)

The combined total VOC
emissions shall not
exceed 68.3 tons per
rolling 12-month period
for all coatings and
cleanup materials used
in units R005, R006,
R007, R008, R009 and
R010.

The combined total
hazardous air pollutants
(HAP) emissions shall
not exceed 9.9 tons per
rolling 12-month period
for all single HAP and
24.9 tons per rolling 12-
month period for all HAP

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2.a The hourly VOC limitation and the hourly and annual PE limitations were established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with these limits.

2.b To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G), no photochemically reactive materials (i.e., as raw materials or cleanup materials) shall be employed in this emissions unit.

Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).

B. Operational Restrictions

1. The permittee shall vent all emissions through the dry filtration system whenever this emissions unit is in operation.
2. The maximum annual coating usage for emissions units R005, R006, R007, R008, R009 and R010 shall not exceed 23,400 gallons, based upon a rolling, 12-month summation of the coating usage figures.
3. Coating content may not exceed 5.69 pounds VOC per gallon. Cleanup content may not exceed 6.82 pounds VOC per gallon.
4. The maximum annual clean up usage for emissions units R005, R006, R007, R008, R009 and R010 shall not exceed 500 gallons, based upon a rolling, 12-month summation of the coating usage figures.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the coating operation:

- a. the name and identification number of each coating and cleanup material, as applied;
- b. the number of gallons of each coating employed;
- c. the number of gallons of each cleanup material employed;
- d. the VOC content of each coating, in pounds of VOC per gallon of coating, excluding water and exempt solvents; and
- e. the VOC content of each cleanup material, in pounds of VOC per gallon of cleanup, excluding water and exempt solvents.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. The permittee shall maintain monthly records of the following information:
 - a. the monthly VOC emission rate for all coatings and cleanup materials combined, calculated by summing the calculated emission rate of each coating and cleanup material, i.e., $[(C.1.b)(C.1.d)+(C.1.c)(C.1.e)]/(2000 \text{ lbs/ton})$, in tons;
 - b. the rolling, 12-month summation of the VOC emission rate for all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010, in tons;
 - c. the rolling, 12-month summation of the coating and cleanup materials usage for all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010, in gallons.
 - d. the individual HAP¹ content of each HAP for each coating and cleanup materials in pounds of individual HAP per gallon, as applied;
 - e. the total combined HAP content of each coating and cleanup materials in pounds of combined HAPs per gallon, as applied (sum of all individual HAP contents from e);
 - f. the total individual HAP emissions for each HAP from all coating and cleanup material in pounds or tons per rolling, 12-month period (for each HAP the sum of the individual HAP¹ content of each HAP for each coating in term C.2.d times

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term C.1.b for each coating and the sum of the individual HAP¹ content of each HAP for each cleanup material in term C.2.d times term C.1.c for each cleanup material); and

- g. the total combined HAP emissions from all coating and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of the total combined HAP content for all coatings in term C.2.e times term C.1.b for each coating and plus the sum of the total combined HAP content for all cleanup materials in term C.2.e times term C.1.c for each cleanup material).

¹A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

- 3. 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.
- 4. The permit to install for emissions unit R007 is evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: n-Hexane

TLV (mg/m³): 176

Maximum Hourly Emission Rate (lbs/hr): 2.53

Predicted 1-Hour Maximum Ground-Level Concentration at the Fenceline (ug/m³): 336.5

MAGLC (ug/m³): 4196

- 5. Physical changes to or changes in the method of operation of these emissions units after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a

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change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

- 6. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

- 1. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.
- 2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. an identification of each hour during which the hourly VOC emission rate from the coatings and cleanup materials exceeded 17.1 lbs/hr, and the actual hourly VOC emission rate for each such hour.

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- b. the VOC content limit for coating materials;
- c. the VOC content limit for cleanup materials;
- d. the rolling, 12-month coating usage limitation;
- e. the rolling, 12-month cleanup usage limitation;
- f. the rolling, 12-month total individual HAP emission limitation;
- g. the rolling, 12-month total combined HAP emissions limitation; and
- h. the rolling, 12-month total VOC emission limitation.

These quarterly deviation (excursion) reports shall be submitted as described in the General Terms and Conditions.

3. The permittee shall submit annual reports which specify the VOC, individual HAP and total combined HAP emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

E. Testing Requirements

1. Compliance with the emission limitations of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
VOC emissions shall not exceed 17.1 lbs/hr.

Applicable Compliance Method:
Compliance shall be determined by the record keeping performed pursuant to Section C.1 of this permit.
 - b. Emission Limitation:
The combined total VOC emissions shall not exceed 68.3 tons per rolling 12-month period for all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010.

Applicable Compliance Method:

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Compliance shall be based upon the summation of the daily VOC emissions per the record keeping requirements specified in Section C.2 of this permit.

- c. Emission Limitation:
 The individual HAP emissions shall not exceed 9.9 tons per rolling 12-month period for all single HAP from all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.2 of this permit.

- d. Emission Limitation:
 The combined total HAP emissions shall not exceed 24.9 tons per rolling 12-month period for all HAP from all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.2 of this permit.

- e. Emission Limitation:
 PE shall not exceed 0.2 lb/hr.

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation may be used:

$$E = (\text{maximum coating solids usage rate in pounds per hour}) (1-TE) (1-CE)$$

$$E = \text{particulate emissions rate (lbs/hr)}$$

$$TE = \text{transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (75\% for the automated adhesive coating line)}$$

$$CE = \text{fractional control efficiency of the control equipment (87.5\% for dry)}$$

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filtration system)

If required, the permittee shall demonstrate compliance with this emission limitation through emissions tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(10).

- f. Emission Limitation:
PE emissions shall not exceed 0.9 ton/year.

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly limitation by 8,760 hours/year and then dividing by 2,000 pounds/ton. Compliance with the annual emission limitation may be assumed as long as compliance with the hourly emission limitation is maintained.

- g. Emission Limitation:
Visible PE from any stack shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

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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).

- h. USEPA Method 24 shall be used to determine the VOC contents for the coatings and cleanup materials. If an owner or operator determines that Method 24, 40 CFR Part 60, Appendix A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

F. Miscellaneous Requirements

None

**Londr
PTI A**

Emissions Unit ID: **R008**

Issued: To be entered upon final issuance

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
R008 - Honda adhesive coating line No. 2 with two spray booths and one IR Oven (Terms in this permit supercede those identified in PTI 01-08878 issued 5/17/2005)	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-11(B)(1)
	OAC rule 3745-31-05(C)	OAC rule 3745-17-07(A)(1)
	OAC rule 3745-21-07(G)(2)	

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Emissions Unit ID: **R008**

Applicable Emissions Limitations/Control Measures	from all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010.
Volatile organic compound (VOC) emissions shall not exceed 17.1 lbs/hr.	See Sections B.2, B.3, and B.4 below. See Sections A.2.b below.
Particulate emissions (PE) shall not exceed 0.2 lb/hr and 0.9 ton/year.	The hourly PE limitation established by this rule is less stringent than that established pursuant to OAC rule 3745-31- 05(A)(3).
See Sections A.2.a below.	
The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-05(C)	Visible PE from any stack shall not exceed 20% opacity, as a six- minute average, except as provided by rule.
The combined total VOC emissions shall not exceed 68.3 tons per rolling 12-month period for all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010.	
The combined total hazardous air pollutants (HAP) emissions shall not exceed 9.9 tons per rolling 12-month period for all single HAP and 24.9 tons per rolling 12- month period for all HAP	

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2. Additional Terms and Conditions

2.a The hourly VOC limitation and the hourly and annual PE limitations were established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with these limits.

2.b To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G), no photochemically reactive materials (i.e., as raw materials or cleanup materials) shall be employed in this emissions unit.

Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).

B. Operational Restrictions

1. The permittee shall vent all emissions through the dry filtration system whenever this emissions unit is in operation.
2. The maximum annual coating usage for emissions units R005, R006, R007, R008, R009 and R010 shall not exceed 23,400 gallons, based upon a rolling, 12-month summation of the coating usage figures.
3. Coating content may not exceed 5.69 pounds VOC per gallon. Cleanup content may not exceed 6.82 pounds VOC per gallon.
4. The maximum annual clean up usage for emissions units R005, R006, R007, R008, R009 and R010 shall not exceed 500 gallons, based upon a rolling, 12-month summation of the coating usage figures.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the coating operation:

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- a. the name and identification number of each coating and cleanup material, as applied;
- b. the number of gallons of each coating employed;
- c. the number of gallons of each cleanup material employed;
- d. the VOC content of each coating, in pounds of VOC per gallon of coating, excluding water and exempt solvents; and
- e. the VOC content of each cleanup material, in pounds of VOC per gallon of cleanup, excluding water and exempt solvents.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. The permittee shall maintain monthly records of the following information:
 - a. the monthly VOC emission rate for all coatings and cleanup materials combined, calculated by summing the calculated emission rate of each coating and cleanup material, i.e., $[(C.1.b)(C.1.d)+(C.1.c)(C.1.e)]/(2000 \text{ lbs/ton})$, in tons;
 - b. the rolling, 12-month summation of the VOC emission rate for all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010, in tons;
 - c. the rolling, 12-month summation of the coating and cleanup materials usage for all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010, in gallons.
 - d. the individual HAP¹ content of each HAP for each coating and cleanup materials in pounds of individual HAP per gallon, as applied;
 - e. the total combined HAP content of each coating and cleanup materials in pounds of combined HAPs per gallon, as applied (sum of all individual HAP contents from e);
 - f. the total individual HAP emissions for each HAP from all coating and cleanup material in pounds or tons per rolling, 12-month period (for each HAP the sum of the individual HAP¹ content of each HAP for each coating in term C.2.d times

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term C.1.b for each coating and the sum of the individual HAP¹ content of each HAP for each cleanup material in term C.2.d times term C.1.c for each cleanup material); and

- g. the total combined HAP emissions from all coating and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of the total combined HAP content for all coatings in term C.2.e times term C.1.b for each coating and plus the sum of the total combined HAP content for all cleanup materials in term C.2.e times term C.1.c for each cleanup material).

¹A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

3. 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.
4. The permit to install for emissions unit R008 is evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: n-Hexane

TLV (mg/m³): 176

Maximum Hourly Emission Rate (lbs/hr): 2.53

Predicted 1-Hour Maximum Ground-Level Concentration at the Fenceline (ug/m³): 336.5

MAGLC (ug/m³): 4196

5. Physical changes to or changes in the method of operation of these emissions units after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to

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determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

6. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.
2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. an identification of each hour during which the hourly VOC emission rate from the coatings and cleanup materials exceeded 17.1 lbs/hr, and the actual hourly VOC emission rate for each such hour.

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- b. the VOC content limit for coating materials;
- c. the VOC content limit for cleanup materials;
- d. the rolling, 12-month coating usage limitation;
- e. the rolling, 12-month cleanup usage limitation;

- f. the rolling, 12-month total individual HAP emission limitation;
- g. the rolling, 12-month total combined HAP emissions limitation; and
- h. the rolling, 12-month total VOC emission limitation.

These quarterly deviation (excursion) reports shall be submitted as described in the General Terms and Conditions.

- 3. The permittee shall submit annual reports which specify the VOC, individual HAP and total combined HAP emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

E. Testing Requirements

- 1. Compliance with the emission limitations of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
VOC emissions shall not exceed 17.1 lbs/hr.

Applicable Compliance Method:
Compliance shall be determined by the record keeping performed pursuant to Section C.1 of this permit.
 - b. Emission Limitation:
The combined total VOC emissions shall not exceed 68.3 tons per rolling 12-month period for all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010.

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Applicable Compliance Method:

Compliance shall be based upon the summation of the daily VOC emissions per the record keeping requirements specified in Section C.2 of this permit.

- c. Emission Limitation:
The individual HAP emissions shall not exceed 9.9 tons per rolling 12-month period for all single HAP from all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.2 of this permit.

- d. Emission Limitation:
The combined total HAP emissions shall not exceed 24.9 tons per rolling 12-month period for all HAP from all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.2 of this permit.

- e. Emission Limitation:
PE shall not exceed 0.2 lb/hr.

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation may be used:

$$E = (\text{maximum coating solids usage rate in pounds per hour}) (1-TE) (1-CE)$$

$$E = \text{particulate emissions rate (lbs/hr)}$$

$$TE = \text{transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (75\% for the automated adhesive coating line)}$$

$$CE = \text{fractional control efficiency of the control equipment (87.5\% for dry)}$$

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filtration system)

If required, the permittee shall demonstrate compliance with this emission limitation through emissions tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(10).

- f. Emission Limitation:
PE emissions shall not exceed 0.9 ton/year.

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly limitation by 8,760 hours/year and then dividing by 2,000 pounds/ton. Compliance with the annual emission limitation may be assumed as long as compliance with the hourly emission limitation is maintained.

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- g. Emission Limitation:
Visible PE from any stack shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

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).

- h. USEPA Method 24 shall be used to determine the VOC contents for the coatings and cleanup materials. If an owner or operator determines that Method 24, 40 CFR Part 60, Appendix A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

F. Miscellaneous Requirements

None

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
R009 - Manual touch up spray booth (Terms in this permit supercede those identified in PTI 01-08878 issued 5/17/2005)	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-11(B)(1)
		OAC rule 3745-17-07(A)(1)
	OAC rule 3745-31-05(C)	
	OAC rule 3745-21-07(G)(2)	

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<u>Applicable Emissions Limitations/Control Measures</u>	month period for all HAP from all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010.
Volatile organic compound (VOC) emissions shall not exceed 17.1 lbs/hr.	See Sections B.2, B.3, and B.4 below. See Sections A.2.b below.
Particulate emissions (PE) shall not exceed 0.2 lb/hr and 0.9 ton/year.	The hourly PE limitation established by this rule is less stringent than that established pursuant to OAC rule 3745-31-05(A)(3).
See Sections A.2.a below.	
The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-05(C)	Visible PE from any stack shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
The combined total VOC emissions shall not exceed 68.3 tons per rolling 12-month period for all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010.	
The combined total hazardous air pollutants (HAP) emissions shall not exceed 9.9 tons per rolling 12-month period for all single HAP and 24.9 tons per rolling 12-	

2. Additional Terms and Conditions

- 2.a** The hourly VOC limitation and the hourly and annual PE limitations were established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with these limits.
- 2.b** To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G), no photochemically reactive materials (i.e., as raw materials or cleanup materials) shall be employed in this emissions unit.

Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).

B. Operational Restrictions

1. The permittee shall vent all emissions through the dry filtration system whenever this emissions unit is in operation.
2. The maximum annual coating usage for emissions units R005, R006, R007, R008, R009 and R010 shall not exceed 23,400 gallons, based upon a rolling, 12-month summation of the coating usage figures.
3. Coating content may not exceed 5.69 pounds VOC per gallon. Cleanup content may not exceed 6.82 pounds VOC per gallon.
4. The maximum annual clean up usage for emissions units R005, R006, R007, R008, R009 and R010 shall not exceed 500 gallons, based upon a rolling, 12-month summation of the coating usage figures.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the coating operation:

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- a. the name and identification number of each coating and cleanup material, as applied;
- b. the number of gallons of each coating employed;
- c. the number of gallons of each cleanup material employed;
- d. the VOC content of each coating, in pounds of VOC per gallon of coating, excluding water and exempt solvents; and
- e. the VOC content of each cleanup material, in pounds of VOC per gallon of cleanup, excluding water and exempt solvents.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. The permittee shall maintain monthly records of the following information:
 - a. the monthly VOC emission rate for all coatings and cleanup materials combined, calculated by summing the calculated emission rate of each coating and cleanup material, i.e., $[(C.1.b)(C.1.d)+(C.1.c)(C.1.e)]/(2000 \text{ lbs/ton})$, in tons;
 - b. the rolling, 12-month summation of the VOC emission rate for all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010, in tons;
 - c. the rolling, 12-month summation of the coating and cleanup materials usage for all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010, in gallons.
 - d. the individual HAP¹ content of each HAP for each coating and cleanup materials in pounds of individual HAP per gallon, as applied;
 - e. the total combined HAP content of each coating and cleanup materials in pounds of combined HAPs per gallon, as applied (sum of all individual HAP contents from e);
 - f. the total individual HAP emissions for each HAP from all coating and cleanup material in pounds or tons per rolling, 12-month period (for each HAP the sum of the individual HAP¹ content of each HAP for each coating in term C.2.d times

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term C.1.b for each coating and the sum of the individual HAP¹ content of each HAP for each cleanup material in term C.2.d times term C.1.c for each cleanup material); and

- g. the total combined HAP emissions from all coating and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of the total combined HAP content for all coatings in term C.2.e times term C.1.b for each coating and plus the sum of the total combined HAP content for all cleanup materials in term C.2.e times term C.1.c for each cleanup material).

¹A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

- 3. 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.
- 4. The permit to install for emissions unit R009 is evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: n-Hexane

TLV (mg/m³): 176

Maximum Hourly Emission Rate (lbs/hr): 2.53

Predicted 1-Hour Maximum Ground-Level Concentration at the Fenceline (ug/m³): 336.5

MAGLC (ug/m³): 4196

- 5. Physical changes to or changes in the method of operation of these emissions units after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a

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change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

6. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.
2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. an identification of each hour during which the hourly VOC emission rate from the coatings and cleanup materials exceeded 17.1 lbs/hr, and the actual hourly VOC emission rate for each such hour.

- b. the VOC content limit for coating materials;
- c. the VOC content limit for cleanup materials;
- d. the rolling, 12-month coating usage limitation;
- e. the rolling, 12-month cleanup usage limitation;
- f. the rolling, 12-month total individual HAP emission limitation;
- g. the rolling, 12-month total combined HAP emissions limitation; and
- h. the rolling, 12-month total VOC emission limitation.

These quarterly deviation (excursion) reports shall be submitted as described in the General Terms and Conditions.

- 3. The permittee shall submit annual reports which specify the VOC, individual HAP and total combined HAP emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

E. Testing Requirements

- 1. Compliance with the emission limitations of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
VOC emissions shall not exceed 17.1 lbs/hr.

Applicable Compliance Method:
Compliance shall be determined by the record keeping performed pursuant to Section C.1 of this permit.
 - b. Emission Limitation:
The combined total VOC emissions shall not exceed 68.3 tons per rolling 12-month period for all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010.

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Applicable Compliance Method:

Compliance shall be based upon the summation of the daily VOC emissions per the record keeping requirements specified in Section C.2 of this permit.

- c. Emission Limitation:
The individual HAP emissions shall not exceed 9.9 tons per rolling 12-month period for all single HAP from all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.2 of this permit.

- d. Emission Limitation:
The combined total HAP emissions shall not exceed 24.9 tons per rolling 12-month period for all HAP from all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.2 of this permit.

- e. Emission Limitation:
PE shall not exceed 0.2 lb/hr.

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation may be used:

$$E = (\text{maximum coating solids usage rate in pounds per hour}) (1-TE) (1-CE)$$

$$E = \text{particulate emissions rate (lbs/hr)}$$

$$TE = \text{transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (75\% for the automated adhesive coating line)}$$

$$CE = \text{fractional control efficiency of the control equipment (87.5\% for dry filtration system)}$$

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If required, the permittee shall demonstrate compliance with this emission limitation through emissions tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(10).

- f. Emission Limitation:
PE emissions shall not exceed 0.9 ton/year.

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly limitation by 8,760 hours/year and then dividing by 2,000 pounds/ton. Compliance with the annual emission limitation may be assumed as long as compliance with the hourly emission limitation is maintained.

- g. Emission Limitation:
Visible PE from any stack shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

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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).

- h. USEPA Method 24 shall be used to determine the VOC contents for the coatings and cleanup materials. If an owner or operator determines that Method 24, 40 CFR Part 60, Appendix A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

F. Miscellaneous Requirements

None

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
R010 - Manual touch up spray booth (Terms in this permit supercede those identified in PTI 01-08878 issued 5/17/2005)	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-11(B)(1)
		OAC rule 3745-17-07(A)(1)
	OAC rule 3745-31-05(C)	
	OAC rule 3745-21-07(G)(2)	

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Applicable Emissions from all coatings and cleanup
Limitations/Control materials used in units R005,
Measures R006, R007, R008, R009 and
R010.

Volatile organic
compound (VOC) See Sections B.2, B.3, and B.4
emissions shall not below.
exceed 17.1 lbs/hr.

See Sections A.2.b below.

Particulate emissions
(PE) shall not exceed 0.2 The hourly PE limitation
lb/hr and 0.9 ton/year. established by this rule is less
stringent than that established

See Sections A.2.a pursuant to OAC rule 3745-31-
below. 05(A)(3).

The requirements of this Visible PE from any stack shall
rule also include not exceed 20% opacity, as a six-
compliance with the minute average, except as
requirements of OAC provided by rule.
rules 3745-17-07(A)(1)
and 3745-31-05(C)

The combined total VOC
emissions shall not
exceed 41 tons per
rolling 12-month period
for all coatings and
cleanup materials used
in units R005, R006,
R007, R008, R009 and
R010.

The combined total
hazardous air pollutants
(HAP) emissions shall
not exceed 9.9 tons per
rolling 12-month period
for all single HAP and
24.9 tons per rolling 12-
month period for all HAP

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2.a The hourly VOC limitation and the hourly and annual PE limitations were established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with these limits.

2.b To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G), no photochemically reactive materials (i.e., as raw materials or cleanup materials) shall be employed in this emissions unit.

Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).

B. Operational Restrictions

1. The permittee shall vent all emissions through the dry filtration system whenever this emissions unit is in operation.
2. The maximum annual coating usage for emissions units R005, R006, R007, R008, R009 and R010 shall not exceed 23,400 gallons, based upon a rolling, 12-month summation of the coating usage figures.
3. Coating content may not exceed 5.69 pounds VOC per gallon. Cleanup content may not exceed 6.82 pounds VOC per gallon.
4. The maximum annual clean up usage for emissions units R005, R006, R007, R008, R009 and R010 shall not exceed 500 gallons, based upon a rolling, 12-month summation of the coating usage figures.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the coating operation:

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- a. the name and identification number of each coating and cleanup material, as applied;
- b. the number of gallons of each coating employed;
- c. the number of gallons of each cleanup material employed;
- d. the VOC content of each coating, in pounds of VOC per gallon of coating, excluding water and exempt solvents; and
- e. the VOC content of each cleanup material, in pounds of VOC per gallon of cleanup, excluding water and exempt solvents.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. The permittee shall maintain monthly records of the following information:
 - a. the monthly VOC emission rate for all coatings and cleanup materials combined, calculated by summing the calculated emission rate of each coating and cleanup material, i.e., $[(C.1.b)(C.1.d)+(C.1.c)(C.1.e)]/(2000 \text{ lbs/ton})$, in tons;
 - b. the rolling, 12-month summation of the VOC emission rate for all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010, in tons;
 - c. the rolling, 12-month summation of the coating and cleanup materials usage for all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010, in gallons.
 - d. the individual HAP¹ content of each HAP for each coating and cleanup materials in pounds of individual HAP per gallon, as applied;
 - e. the total combined HAP content of each coating and cleanup materials in pounds of combined HAPs per gallon, as applied (sum of all individual HAP contents from e);
 - f. the total individual HAP emissions for each HAP from all coating and cleanup material in pounds or tons per rolling, 12-month period (for each HAP the sum of the individual HAP¹ content of each HAP for each coating in term C.2.d times term C.1.b for each coating and the sum of the individual HAP¹ content of each

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HAP for each cleanup material in term C.2.d times term C.1.c for each cleanup material); and

- g. the total combined HAP emissions from all coating and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of the total combined HAP content for all coatings in term C.2.e times term C.1.b for each coating and plus the sum of the total combined HAP content for all cleanup materials in term C.2.e times term C.1.c for each cleanup material).

¹A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

- 3. 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.
- 4. The permit to install for emissions unit R010 is evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: n-Hexane

TLV (mg/m³): 176

Maximum Hourly Emission Rate (lbs/hr): 2.53

Predicted 1-Hour Maximum Ground-Level Concentration at the Fenceline (ug/m³): 336.5

MAGLC (ug/m³): 4196

- 5. Physical changes to or changes in the method of operation of these emissions units after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to

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determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

6. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.
2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. an identification of each hour during which the hourly VOC emission rate from the coatings and cleanup materials exceeded 17.1 lbs/hr, and the actual hourly VOC emission rate for each such hour.
 - b. the VOC content limit for coating materials;
 - c. the VOC content limit for cleanup materials;
 - d. the rolling, 12-month coating usage limitation;
 - e. the rolling, 12-month cleanup usage limitation;
 - f. the rolling, 12-month total individual HAP emission limitation;
 - g. the rolling, 12-month total combined HAP emissions limitation; and
 - h. the rolling, 12-month total VOC emission limitation.

These quarterly deviation (excursion) reports shall be submitted as described in the General Terms and Conditions.

3. The permittee shall submit annual reports which specify the VOC, individual HAP and total combined HAP emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

E. Testing Requirements

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1. Compliance with the emission limitations of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
VOC emissions shall not exceed 17.1 lbs/hr.

Applicable Compliance Method:
Compliance shall be determined by the record keeping performed pursuant to Section C.1 of this permit.
 - b. Emission Limitation:
The combined total VOC emissions shall not exceed 68.3 tons per rolling 12-month period for all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010.

Applicable Compliance Method:
Compliance shall be based upon the summation of the daily VOC emissions per the record keeping requirements specified in Section C.2 of this permit.
 - c. Emission Limitation:
The individual HAP emissions shall not exceed 9.9 tons per rolling 12-month period for all single HAP from all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section C.2 of this permit.

- d. Emission Limitation:
 The combined total HAP emissions shall not exceed 24.9 tons per rolling 12-month period for all HAP from all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C.2 of this permit.

- e. Emission Limitation:
 PE shall not exceed 0.2 lb/hr.

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation may be used:

$$E = (\text{maximum coating solids usage rate in pounds per hour}) (1-TE) (1-CE)$$

$$E = \text{particulate emissions rate (lbs/hr)}$$

$$TE = \text{transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (75\% for the automated adhesive coating line)}$$

$$CE = \text{fractional control efficiency of the control equipment (87.5\% for dry filtration system)}$$

If required, the permittee shall demonstrate compliance with this emission limitation through emissions tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(10).

- f. Emission Limitation:
 PE emissions shall not exceed 0.9 ton/year.

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly limitation by 8,760 hours/year and then dividing by 2,000 pounds/ton.

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Compliance with the annual emission limitation may be assumed as long as compliance with the hourly emission limitation is maintained.

- g. Emission Limitation:
Visible PE from any stack shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

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).

- h. USEPA Method 24 shall be used to determine the VOC contents for the coatings and cleanup materials. If an owner or operator determines that Method 24, 40 CFR Part 60, Appendix A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

F. Miscellaneous Requirements

None