Ohio Environmental Protection Agency

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

Certified Mail

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

11/8/2010

Michael Wittman
AMERICAN TRIM LLC PRODUCT CENTER 2
1005 W. GRAND AVE
LIMA, OH 45801

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0302020155
Permit Number: P0106928
Permit Type: OAC Chapter 3745-31 Modification
County: Allen

Dear Permit Holder:

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

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

and

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461.

Sincerely,

Michael W. Ahern

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

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

Allen County

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
AMERICAN TRIM LLC PRODUCT CENTER 2

Issue Date: 11/8/2010
Permit Number: P0106928
Permit Type: OAC Chapter 3745-31 Modification
Permit Description: Modification of miscellaneous metal parts coating line to provide the ability to investigate and apply new technologies, including re-configuring the layout of the conveyor, adding printing stations that will allow more flexibility in the operation of the line, and establishing federally enforceable limitations for hazardous air pollutants and VOC to avoid Title V.
Facility ID: 0302020155
Facility Location: AMERICAN TRIM LLC PRODUCT CENTER 2
651 NORTH BAXTER ST,
LIMA, OH 45801
Facility Description: Metal Stamping

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Donald Waltermeyer at Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402 or (419)352-8461. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc

Ohio | Environmental Protection Agency

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
AMERICAN TRIM LLC PRODUCT CENTER 2

Facility ID:	0302020155
Permit Number:	P0106928
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	11/8/2010
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
AMERICAN TRIM LLC PRODUCT CENTER 2

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Authorization

Facility ID: 0302020155
Application Number(s): A0040319
Permit Number: P0106928
Permit Description: Modification of miscellaneous metal parts coating line to provide the ability to investigate and apply new technologies, including re-configuring the layout of the conveyor, adding printing stations that will allow more flexibility in the operation of the line, and establishing federally enforceable limitations for hazardous air pollutants and VOC to avoid Title V.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: $200.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 11/8/2010
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

AMERICAN TRIM LLC PRODUCT CENTER 2
651 NORTH BAXTER ST
LIMA, OH 45801

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Authorization (continued)

Permit Number: P0106928
Permit Description: modification of miscellaneous metal parts coating line to provide the ability to investigate and apply new technologies, including re-configuring the layout of the conveyor, adding printing stations that will allow more flexibility in the operation of the line, and establishing federally enforceable limitations for hazardous air pollutants and VOC to avoid Title V.

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

Emissions Unit ID:	**K002**
Company Equipment ID:	Coater Line
Superseded Permit Number:	03-10397
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.
The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

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

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

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

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

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

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

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

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.
If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

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

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

7. What reports must I submit under this permit?

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

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

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).
The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

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

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

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

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northwest District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.
If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

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

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

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

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.
You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting[1] a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.
You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated

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

while the emissions unit was in operation, for at least five years from the date the record was generated.
Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) None.

C. Emissions Unit Terms and Conditions

1. K002, Coater Line

Operations, Property and/or Equipment Description:

miscellaneous metal parts coating line with 3 natural gas fired ovens, including roll coating and screen printing operations.

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

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

a. b)(1)d., d)(4), d)(5), d)(6), d)(7) and e)(4).

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

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

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)	See b)(2)a.
b.	OAC rule 3745-31-05(D)	28.80 tons of volatile organic compounds (VOC) per rolling, 12-month period from all coatings and cleanup materials employed in this emissions unit, combined [See b)(2)b. and b)(2)c.] 9 tons per rolling, 12-month period for any individual Hazardous Air Pollutant (HAP) and 24 tons per rolling, 12-month period for any combination of HAPs [See b)(2)e., b)(2)d. and b)(2)e.]

c.	OAC rule 3745-21-09(U)(1)(c)	See b)(2)i.
d.	OAC rule 3745-114-01 and ORC 3704.03(F)	See d)(5) through d)(8)

(2) Additional Terms and Conditions

a. The BAT requirements under ORC 3704.03(T) have been determined to be compliance with the rolling, 12-month VOC limitation established under OAC rule 3745-31-05(D).

b. This permit establishes the following federally enforceable limitations on emissions of VOC and HAPs for purposes of avoiding Maximum Achievable Control Technology (MACT) regulations and Title V permitting requirements:

i. 28.80 tons of VOC per rolling, 12-month period from all coatings and cleanup materials employed in emissions unit K002, combined, based on a coating/cleanup material usage restriction [See c)(1)]. Annual HAP emissions from emissions units K002 shall not exceed 9 tons per year for any individual HAP and 24 tons per year for total combined HAPs, based on a rolling, 12-month summation of the monthly HAP emissions. HAP means any air pollutant listed in or pursuant to Section 112 (b) of the Clean Air Act.

ii. Since emissions unit K002 is the only operating emissions unit at this facility, the rolling, 12-month VOC and HAPs emissions limitations effectively limit the facility-wide emissions.

c. The emissions of VOC from this emissions unit shall not exceed 28.80 tons per year, based upon a rolling, 12-month summation of the monthly emissions. To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissions of VOC (Tons)
1	5.76
1-2	11.52
1-3	17.28
1-4	23.04
1-5	28.80
1-6	28.80
1-7	28.80

1-8	28.80
1-9	28.80
1-10	28.80
1-11	28.80
1-12	28.80

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

d. The emissions of any individual HAP from this emissions unit shall not exceed 9 tons per year, based upon a rolling, 12-month summation of the monthly HAP emissions. To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissions of any individual HAP (Tons)
1	1.80
1-2	3.60
1-3	5.40
1-4	7.20
1-5	9.00
1-6	9.00
1-7	9.00
1-8	9.00
1-9	9.00
1-10	9.00
1-11	9.00
1-12	9.00

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission

limitation for any individual HAP shall be based upon a rolling, 12-month summation of the monthly HAP emissions.

e. The emissions of total combined HAPs from this emissions unit shall not exceed 24 tons per year, based upon a rolling, 12-month summation of the monthly total combined HAPs emissions. To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissions of Total Combined HAPs (Tons)
1	4.80
1-2	9.60
1-3	14.40
1-4	19.20
1-5	24.00
1-6	24.00
1-7	24.00
1-8	24.00
1-9	24.00
1-10	24.00
1-11	24.00
1-12	24.00

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for total combined HAPs shall be based upon a rolling, 12-month summation of the monthly HAP emissions.

f. The VOC content of the coatings employed shall not exceed a daily volume-weighted average of 3.5 lbs per gallon, as applied, excluding water and exempt solvents. The coatings employed in this emissions unit are considered to be extreme performance coatings, per the definition in OAC rule 3745-21-01(D)(45).

c) Operational Restrictions

(1) The maximum rolling, 12-month quantity of coatings and cleanup materials employed in emissions unit K002, is limited by the following equation:

12 n

$$\sum_{M=1}^{12} \sum_{i=1}^{n} [(V_i)(G_i)] \div 2{,}000 \text{ lbs/ton} \leq 28.80$$

where,

M = the increment of the rolling 12-month period;

V_i = VOC content in pounds per gallon of each coating/cleanup material employed;

G_i = Gallons used of each coating and cleanup material for the rolling, 12-month period

n = total number of unique coatings and cleanup materials employed in emissions unit K002

d) Monitoring and/or Recordkeeping Requirements

a.

(1) The permittee shall collect and record the following information each month for all coatings and cleanup materials employed in this emissions unit:

a. the name and identification number of each coating and cleanup material employed;

b. the VOC content of each coating and cleanup material employed, in lbs per gallon, as applied;

c. the volume, in gallons, of each coating and cleanup material employed;

d. the VOC emission rate for each coating and cleanup material employed [d)(1)b. times d)(1)c.], in lbs;

e. the cumulative monthly VOC emission rate for all coatings and cleanup materials employed [summation of d)(1)d.], in tons;

f. during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative VOC emissions for each calendar month; and

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

Note: The information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

(2) The permittee shall collect and record the following HAP information each month for this emissions unit:

a. the name and identification number of each coating and cleanup material employed;

b. the amount of each individual HAP in each coating and cleanup material, in lbs/gallon, as applied;

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

d. the emission rate for each individual HAP from each coating and cleanup material employed (b times c) for each individual HAP, in lbs;

e. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of d for all coatings and cleanup materials), in lbs;

f. the total HAP emission rate for all HAPs, combined from all the coatings and cleanup materials employed (summation of e for all HAPs for all coatings and cleanup materials), in lbs; and

g. during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative HAPs emissions for each calendar month; and

h. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the HAPs emissions.

Note: The information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

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

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

b. The VOC content (excluding water and exempt solvents) of each coating, as applied.

c. The number of gallons (excluding water and exempt solvents) of each coating, as applied.

d. The daily volume-weighted average VOC content of all the coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

Note: If the VOC content of each of the coatings employed during a day is less than 3.5 lbs per gallon, as applied, excluding water and exempt solvents, the daily volume-weighted average VOC content record is not required for that day.

(4) The federally enforceable permit-to-install and operate (FEPTIO) application for this emissions unit, K002, was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this emissions unit for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

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

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

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

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

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit, i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4\ TLV/XY = MAGLC$$

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

Toxic Contaminant: toluene w/ option* to list all toxics, covered under the worst-case toxic modeled.

TLV (mg/m3): 75

Maximum Hourly Emission Rate (lbs/hr): 6.56

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 836

MAGLC (ug/m3): 4,470

The permittee, has demonstrated that emissions of toluene, from emissions unit K002, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

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

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

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

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

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

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

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s)

modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

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

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

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

(7) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

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

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

b. all exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9 tons and 24 tons, respectively, and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative HAPs emission levels;

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

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

e. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31, April 30, July 31, and October 31, and shall cover the previous calendar quarters unless an alternative schedule has been established and approved by the Director (Ohio EPA, Northwest District Office).

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

(3) The permittee shall notify the Director (Northwest District Office) in writing of each daily record showing a daily volume-weighted average greater than 3.5 pounds VOC per gallon, as applied, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (Northwest District Office) within 30 days after the exceedance occurs.

(4) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

f) Testing Requirements

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

a. <u>Emission Limitation</u>:

28.80 tons of VOC per rolling, 12-month period from all coatings and cleanup materials employed in this emissions unit, combined

<u>Applicable Compliance Method</u>:

Compliance with the rolling, 12-month VOC emission limitation shall be based upon the record keeping requirements specified in section d)(1).

b. <u>Emission Limitation</u>:

9 tons per rolling, 12-month period for any individual HAP and 24 tons per rolling, 12-month period for any combination of HAPs

<u>Applicable Compliance Method</u>:

Compliance with the rolling, 12-month HAPs emission limitations shall be based upon the record keeping requirements specified in section d)(2).

c. Emission Limitation:

The VOC content of the coatings employed shall not exceed a daily volume-weighted average of 3.5 lbs per gallon, as applied, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance with the VOC content limitation shall be based upon the record keeping requirements specified in section d)(3).

(2) Formulation data of U.S. EPA Method 24 shall be used to determine the VOC contents of all the coatings and cleanup materials.

g) Miscellaneous Requirements

(1) None.