OhioEPA

State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 **FAX:** (614) 644-2329

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

05/29/02

CERTIFIED MAIL

RE: Final Title V Chapter 3745-77 permit

03-87-00-0362
Norplas Industries Inc.
Suzanne M. Custons
7825 Caple Blvd.
Northwood, OH 43619

Dear Suzanne M. Custons:

Enclosed is the Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully.

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

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street
Room 300
Columbus, Ohio 43215

If you have any questions, please contact Northwest District Office.

Very truly yours,

Thomas G. Rigo

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: Northwest District Office
File, DAPC PMU

State of Ohio Environmental Protection Agency

FINAL TITLE V PERMIT

Issue Date: **05/29/02**	Effective Date: **05/29/02**	Expiration Date: **05/29/07**

This document constitutes issuance of a Title V permit for Facility ID: 03-87-00-0362 to:
Norplas Industries Inc.
7825 Caple Blvd.
Northwood, OH 43619

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

B001 (Hot Water Heater) Hot water heater	Misc. Cleanup Operations	Paint Line #1
P001 (Misc. Cleanup Operations)	R001 (Paint Line)	

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

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

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Record Keeping and Reporting Requirements

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

i. The date, place (as defined in the permit), and time of sampling or measurements.
ii. The date(s) analyses were performed.
iii. The company or entity that performed the analyses.
iv. The analytical techniques or methods used.
v. The results of such analyses.
vi. The operating conditions existing at the time of sampling or measurement.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include 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.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

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

i. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))
ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written 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.) See B.6 below if no deviations occurred during the quarter.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))

iii. Written reports, which identify any deviations from the federally enforceable monitoring, record keeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, record keeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))

iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset condition, of any emissions unit(s) 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upset conditions.

Except as provided in OAC rule 3745-15-06, 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).
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iii))

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.
(Authority for term: OAC rule 3745-77-07(A)(4))

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.
(Authority for term: OAC rule 3745-77-07(A)(5))

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
(Authority for term: OAC rule 3745-77-07(A)(6))

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

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

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.10 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

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

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

(Authority for term: OAC rule 3745-77-07(A)(7))

7. 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.
(Authority for term: OAC rule 3745-77-07(A)(8))

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.
(Authority for term: OAC rule 3745-77-07(A)(9))

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.
(Authority for term: OAC rule 3745-77-07(A)(10))

10. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

11. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.
(Authority for term: OAC rule 3745-77-07(B))

12. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based

on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

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

   i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
   ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
   iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
   iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

   i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
   ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

   i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
   ii. Compliance certifications shall include the following:
      (a) An identification of each term or condition of this permit that is the basis of the certification.
      (b) The permittee's current compliance status.
      (c) Whether compliance was continuous or intermittent.
      (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.

(e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

13. Permit Shield

a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

15. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

16. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition;

b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change;

c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F);

d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes; and

e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(For purposes of clarification, the permittee can refer to Engineering Guide #63 that is available in the STARSHIP software package.)
(Authority for term: OAC rule 3745-77-07(I))

17. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.
(This term is provided for informational purposes only.)

18. Insignificant Activities

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.
(Authority for term: OAC rule 3745-77-07(A)(1))

19. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-07(A)(1))

20. 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.
(Authority for term: OAC rule 3745-77-07(A)(1))

B. *State Only Enforceable Section*

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or record keeping 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 record keeping 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.)

2. 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.

3. 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, 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.

4. 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).

5. 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.

6. Additional Reporting Requirements When There Are No Deviations of <u>Federally Enforceable</u> Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

None

B. State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

Z001 Mold Shop Air Makeup HV-1
Z002 Paint Process Air Makeup, Line One, HV-2
Z003 Mold Shop Air Makeup HV-4
Z004 Warehouse/ Assembly Air Makeup HV-6
Z005 Mold Shop, Regrind Switch Gear, Mat'l Stor. HV-8
Z006 Mold Maint. Shop HV-9
Z007 Paint Storage Air Makeup HV-5
Z008 Paint Mix Air Makeup HV-7
Z009 Plant Unit Heater UH-1
Z010 Plant Unit Heater UH-2
Z011 Plant Unit Heater UH-3
Z012 Plant Unit Heater UH-4
Z013 Plant Unit Heater UH-5
Z014 Plant Unit Heater UH-6
Z015 Plant Unit Heater UH-7
Z016 Plant Unit Heater UH-9
Z017 Plant Unit Heater UH-13
Z018 Plant Unit Heater UH-14
Z019 Plant Unit Heater UH-15
Z020 Paint Lab ACU-3
Z021 Shipping Area ACU-4
Z022 Accounting ACU-5
Z023 HR&Mgrs ACU-6
Z024 Cafeteria ACU-7
Z025 Engineering ACU-8
Z026 Board Room ACU-9
Z027 Quality ACU-10
Z028 Storage Tank #1
Z029 Storage Tank #2
P002 Paint Kettle #1
P003 Paint Kettle #2
P004 Paint Kettle #3
P005 Paint Kettle #4
P007 Paint Kettle #6
P008 Paint Kettle #7
P009 Paint Kettle #8
P010 Paint Kettle #9
P011 Paint Kettle #10
P012 Paint Kettle #11
P013 Paint Kettle #12
P014 Paint Kettle #13
P015 Paint Kettle #14
P016 Paint Kettle #15
P017 Paint Kettle #16
P018 Paint Kettle #17
P019 Paint Kettle #18
P020 Paint Kettle #19
P021 Paint Kettle #20
P022 Paint Kettle #21
P023 Paint Kettle #22
P024 Paint Kettle #23
P025 Paint Kettle #24
P026 Paint Kettle #25
P027 Paint Kettle #26
P028 Paint Kettle #27
P029 Paint Kettle #28
P030 Paint Kettle #29
P031 Paint Kettle #30

B. State Only Enforceable Section

P032 Paint Kettle #31
P033 Paint Kettle #32
P034 Paint Kettle #33
P035 Paint Kettle #34
P036 Paint Kettle #35
P037 Paint Kettle #36
P038 Paint Kettle #37
P039 Paint Kettle #38
P040 Paint Kettle #39
P041 Paint Kettle #40
P042 Paint Kettle #41
P043 Paint Kettle #42
P044 Paint Kettle #43
P045 Paint Kettle #44
P046 Paint Kettle #45
P047 Paint Kettle #46
P048 Paint Kettle #47
P049 Paint Kettle #48
P050 Paint Kettle #49
P051 Paint Kettle #50
P052 Paint Kettle #51
PO53 Paint Kettle #52
P054 Paint Kettle #53
P055 Paint Kettle #54
P056 Paint Kettle #55
P057 Paint Kettle #56
P058 Paint Kettle #57
P059 Paint Kettle #58
P060 Paint Kettle #59
P061 Paint Kettle #60

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a Permit to Install for the emissions unit.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Hot Water Heater (B001)

Activity Description: Hot water heater

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
25.1 mmBtu/hr, natural gas-fired boiler	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-10(B)	0.020 lb of PE/mmBtu of actual heat input
	40 CFR, Part 60, Subpart Dc	exempt (See A.II.1.)
	OAC rule 3745-18-06(A)	See A.I.2.a.

2. Additional Terms and Conditions

2.a OAC rule 3745-18-06(A) does not establish sulfur dioxide emission limitations for this emissions unit because the emissions unit only employs natural gas as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas being burned in this emissions unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).

II. Operational Restrictions

1. The permittee shall burn only natural gas in this emissions unit.

III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

V. Testing Requirements

1. Compliance Methods Requirements: Compliance with the emission limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

1.a Emission Limitation:
Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:
If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03 (B)(1).

1.b Emission Limitation:
0.020 lb of PE/mmBtu of actual heat input

Applicable Compliance Method:
The permittee may determine compliance with the lb of PE/mmBtu limitation above by multiplying an emission factor [from AP-42, Fifth Edition, Table 1.4-2 (revised 7/98)] of 1.9 lbs PE (filterable)/mm cu. ft of natural gas by the emissions unit's maximum hourly fuel consumption rate (mm cu. ft/hr), and then dividing by the emissions unit's maximum heat input capacity (mmBtu/hr).

If required, the permittee shall demonstrate compliance with the lb PE/mmBtu PE limitation above in accordance with the methods specified in OAC rule 3745-17-03(B)(9).

VI. Miscellaneous Requirements

1. The permittee installed this emissions unit in March 1998 without first applying for and obtaining a Permit to Install (PTI), in violation of OAC rule 3745-31-02. Therefore, as the initial step to achieve compliance with the applicable requirements, the permittee submitted a PTI application for this emissions unit on September 20, 1999.

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Misc. Cleanup Operations (P001)

Activity Description: Misc. Cleanup Operations

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
miscellaneous cleanup operations	OAC rule 3745-21-07(G)	none (See A.II.1.)
	OAC rule 3745-31-05 (PTI 03-10137)	See A.I.2.a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G).

2. Additional Terms and Conditions

2.a The organic compound (OC) emissions from this emissions unit shall not exceed 85.0 tons/year, based upon a rolling, 12-month summation of the monthly OC emissions.

II. Operational Restrictions

1. The permittee shall not employ any cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:

a. the company identification for each cleanup material employed;

b. documentation on whether or not each cleanup material employed is a photochemically reactive material;

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

d. the OC content of each cleanup material employed, in pounds per gallon;

e. the total OC emission rate for all the cleanup materials employed [summation of (c x d) for all cleanup materials, divided by 2000], in tons; and

f. the rolling, 12-month summation of the monthly OC emission rates, in tons.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each month during which any photochemically reactive cleanup material was employed. The report shall be submitted within 45 days after the occurrence.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month OC emission limitation of 85 tons.

All quarterly reports shall be submitted in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit.

3. The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance Methods Requirements: Compliance with the emission limitation in Section A.I. of the terms and conditions of this permit shall be determined in accordance with the following method:

Emission Limitation:
85.0 tons of OC/rolling, 12-month period

Applicable Compliance Method:
The permittee shall demonstrate compliance with the annual allowable OC emission limitation through the record keeping requirements in Section A.III.1 of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all of the cleanup materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
miscellaneous cleanup operations	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit (P001) was evaluated based on the actual 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: methylene chloride
TLV (ug/m3): 174,000
Maximum Hourly Emission Rate (lbs/hr):
Stack FB1: 1.75
Stack DBF1: 1.75
Stack FB2: 1.75
Stack DFB2: 1.75
Predicted 1-Hour Maximum Ground-LevelConcentration (ug/m3): 1,000
MAGLC (ug/m3): 4,142

III. Monitoring and/or Record Keeping Requirements (continued)

2. Physical changes to or changes in the method of operation of the emissions unit 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 still 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 (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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

3. 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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Line (R001)

Activity Description: Paint Line #1

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
paint line, with thermal oxidizer and permanent total enclosure	OAC rule 3745-31-05 (PTI No. 03-10137)	See A.I.2.a and c. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11(B) and 3745-17-07(A).
	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11	3.3 lbs of PE/hr
	OAC rule 3745-21-07(G)(2)	See A.I.2.b.

2. Additional Terms and Conditions

2.a The permittee shall not cause to be discharged into the atmosphere emissions in excess of the following:

i. 47.2 lbs of organic compounds (OC)/hr [from the thermal oxidizer exhaust stack];

ii. 18.8 tons of OC/month [from the thermal oxidizer exhaust stack and fugitive emissions emitted at the facility, combined];

iii. 398.8 tons of OC/year, based upon a rolling, 12-month summation of the monthly OC emission rates [from the thermal oxidizer exhaust stack and total fugitive emissions*, combined];

iv. 3.1 lbs of nitrogen oxides (NOx)/hr [from the thermal oxidizer exhaust stack];

v. 18.99 tons of NOx/year [from all combustion units associated with this emissions unit].

vi. 1.9 lbs of PM10/hr [from the thermal oxidizer exhaust stack];

vii. 8.5 tons of PM10/year [from all combustion units associated with this emissions unit];

viii. 1.3 lbs of carbon monoxide (CO)/hr [from the thermal oxidizer exhaust stack]; and

ix. 5.7 tons of CO/year [from all combustion units associated with this emissions unit].

* This accounts for OCs emitted (from paint sludge) at the facility, where the sludge is generated, and at the processing/disposal facility (off site), combined.

2.b The control requirements specified by this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).

2.c Best available technology for this emissions unit has been determined to be use of a permanent total enclosure capturing exhaust gases from all paint booths, flash-off areas and bake ovens and exhausting to a regenerative thermal oxidizer in conjunction with an exhaust recirculation system. The bake ovens shall be fitted with low NOx burners. The regenerative thermal oxidizer shall ensure that ninety five percent of the carbon in the organic material being incinerated is oxidized to carbon dioxide. Best available technology for paint application has been determined to be an automatic or robotic paint spray system using electrostatic applicators or equivalent technology. The paint spray system shall achieve transfer efficiencies of 35 - 50%.

II. Operational Restrictions

1. The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1426 degrees Fahrenheit.

2. The permittee shall operate the paint line water wash system whenever this emissions unit is in operation.

II. Operational Restrictions (continued)

3. This emissions unit shall be totally enclosed such that all OC emissions are captured and contained for discharge through the thermal oxidizer. The total enclosure shall meet the following criteria:

a. Any natural draft opening (NDO) shall be at least one equivalent opening diameters from each OC emitting point unless otherwise specified by the Administrator.

b. The total area of all NDOs shall not exceed 5 percent of the surface area of the enclosure's four walls, floor, and ceiling.

c. The direction of air flow through all NDOs shall be into the enclosure.

d. All access doors and windows whose areas are not included in paragraph (b) and are not included in the calculation in paragraph (c) shall be closed during routine operation.

e. All OC emissions must be captured and contained for discharge through the thermal oxidizer.

f. The enclosure shall be under negative pressure during normal worst case operating conditions.

g. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, whenever the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #10137, issued on January 3, 1997: A. III.2 - 6. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

2. The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

a. All 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was less than 1426 degrees Fahrenheit.

b. A log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.

3. The permittee shall maintain and operate monitoring devices and a recorder which continuously and simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record and maintain, each day, the difference in pressure between the permanent total enclosure and the surrounding area(s), in inches of water.

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall collect and record the following information each month for this emissions unit:

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

b. the amount of sludge collected, in pounds;

c. the total facility fugitive emissions of OC resulting from the sludge, in tons, calculated as follows:

Ef = 0.005 lb OC/lb of sludge collected* x (the amount of sludge from Section 4.b above)/2000

where:

Ef = facility fugitive emissions of OC attributed to paint sludge, in tons per month

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

e. the total stack emissions of OC, in tons, calculated as follows:

Es = the total number of hours the emissions unit was in operation (from Section 4.d above) x st /2000

where:

Es = stack OC emissions, in tons per month

st = the hourly OC emission rate (lbs/hr), as determined during the most recent emission testing

f. the total OC emissions generated at the facility (fugitive emissions generated at the facility + stack emissions), in tons (c + e);

g. the total fugitive emissions of OC generated off site and resulting from the sludge, in tons, calculated as follows:

Ef = 0.04 lb OC/lb of sludge collected* x (the amount of sludge from Section 4.b above)/2000

where:

Ef = off-site fugitive emissions of OC attributed to paint sludge, in tons per month

h. the total OC emissions (fugitive emissions generated at the facility + stack emissions + fugitive emissions generated off site), in tons (c + h + e); and

i. the rolling, 12-month summation of the total monthly OC emission rates [calculated by summing the OC emissions (from section A.III.4.h) for the previous 11 calendar months + the OC emissions for the current calendar month], in tons.

* This emission factor is based on information supplied by the permittee. The sludge is assumed to contain 4.5% VOC's, by weight, based on past experience with similar systems. Of this total, 4.0% is emitted at the processing/disposal facility (off-site), and 0.5% is emitted at this facility.

5. The permittee shall maintain daily records that document any time periods when the water wash system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

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

a. all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer did not comply with the temperature limitation specified above;

b. all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified above;

c. all exceedances of the rolling, 12-month OC emission limitation of 398.8 tons; and

d. all exceedances of the monthly OC emission limitation of 18.8 tons.

All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit.

2. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device and monitoring equipment when this emissions unit was in operation.

3. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash 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 Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 6 months after permit issuance and within 6 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for NOx, PE, PM10, CO, and OC and the capture and control efficiencies for OC.

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates:

i. for NOx, Methods 1 through 4 and 7 of 40 CFR, Part 60, Appendix A;

ii. for OC, Method 25 of 40 CFR, Part 60, Appendix A;

iii. for PE, Methods 1 through 5 of 40 CFR, Part 60, Appendix A;

iv. for PM10, Methods 1 through 5 of 40 CFR, Part 60, Appendix A (including back half and size distribution) or Methods 201 or 201A; and

v. for CO, Methods 1 through 4 and 10 of 40 CFR, Part 60, Appendix A.

The test method(s) which must be employed to demonstrate compliance with the capture efficiency and control efficiency limitations for organic compounds are specified below. If applicable. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

V. Testing Requirements (continued)

e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10" or the approved alternative test protocol (e.g., "the mass balance protocol approved on 10/25/95. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases."

2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

3. Compliance Methods Requirements: Compliance with the emission limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

3.a Emission Limitation: Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method: If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03 (B)(1).

3.b Emission Limitation: 3.3 lbs PE/hr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable PE limitation above based upon the results of emission testing conducted in accordance with Methods 1 through 5, 40 CFR, Part 60, Appendix A.

3.c Emission Limitation: 47.2 lbs OC/hr

Applicable Compliance Method:
The permittee shall demonstrate compliance with the hourly allowable OC emission limitation above based upon the results of emission testing conducted in accordance with Method 25, 40 CFR, Part 60, Appendix A.

V. Testing Requirements (continued)

3.d Emission Limitation: 3.1 lbs NOx/hr

Applicable Compliance Method:
The permittee shall demonstrate compliance with the hourly allowable NOx emission limitation above based upon the results of emission testing conducted in accordance with Methods 1 through 4 and 7, 40 CFR, Part 60, Appendix A.

3.e Emission Limitation: 18.8 tons OC/month [from the thermal oxidizer exhaust stack and fugitive OC emissions generated at the facility, combined]

Applicable Compliance Method:
The permittee shall demonstrate compliance with the monthly allowable OC emission limitation above through the record keeping requirements in Section A.III.4 of this permit.

3.f Emission Limitation: 398.8 tons OC/rolling, 12-month period [from the thermal exhaust stack and fugitive*, combined]

Applicable Compliance Method:
The permittee shall demonstrate compliance with the annual allowable OC emission limitation above through the record keeping requirements in Section A.III.4 of this permit.

* This accounts for OCs emitted (from paint sludge) at the facility, where the sludge is generated, and at the processing/disposal facility (off site), combined.

3.g Emission Limitation: 18.99 tons NOx/yr [from all combustion units associated with this emissions unit]

Applicable Compliance Method:
The permittee shall determine compliance with the annual allowable emission limitation for NOx as follows:

i. multiply the permittee-supplied emission factor of 0.081 lb NOx/mmBtu by the maximum hourly heat input (15.1 mmBtu/hr);

ii. multiply g.i by 8760 and divide by 2000;

iii. multiply the hourly NOx emission rate (lbs/hr) (obtained from the results of the most recent emission testing of the thermal oxidizer stack) by 8760, and then divide by 2000; and

iv. add g.ii + g.iii.

3.h Emission Limitation: 1.9 lbs PM10/hr [from the thermal oxidizer exhaust stack]

Applicable Compliance Method:
The permittee shall demonstrate compliance with the hourly allowable PM10 emission limitation above based upon the results of emission testing conducted in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A (including back half and size distribution) or Methods 201 or 201A.

V. Testing Requirements (continued)

3.i Emission Limitation: 8.5 tons PM10/yr [from all combustion units associated with this emissions unit];

Applicable Compliance Method:

The permittee shall determine compliance with the annual allowable emission limitation for PM10 as follows:

i. multiply the emission factor from AP-42, 5th Edition, Table 1.4-2 of 0.0075 lb PM10/mmBtu by the maximum hourly heat input (15.1 mmBtu/hr);

ii. multiply i.i by 8760 and divide by 2000;

iii. multiply the hourly PM10 emission rate (lbs/hr) (obtained from the results of the most recent emission testing of the thermal oxidizer stack) by 8760, and then divide by 2000; and

iv. add i.ii + i.iii.

3.j Emission Limitations:
1.3 lbs CO/hr [from the thermal oxidizer stack]
5.7 tons CO/yr [from the thermal oxidizer stack]

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable CO emission limitation above based upon the results of emission testing conducted in accordance with Methods 1 through 4 and 10 of 40 CFR, Part 60, Appendix A.

Compliance with the annual allowable CO emission limitation shall be assumed as long as compliance with hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
paint line, with thermal oxidizer and permanent total enclosure	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit (R001) was 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-butyl acetate

TLV (ug/m3): 710,000

Maximum Hourly Emission Rate (lbs/hr): 5.13

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2075.96

MAGLC (ug/m3): 16,905

Pollutant: ethyl acetate

TLV (ug/m3): 1,440,000

Maximum Hourly Emission Rate (lbs/hr): 1.84

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2075.96

MAGLC (ug/m3): 34,286

III. Monitoring and/or Record Keeping Requirements (continued)

Pollutant: n-butyl alcohol

TLV (ug/m3): 152,000

Maximum Hourly Emission Rate (lbs/hr): 3.24

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2075.96

MAGLC (ug/m3): 3619

Pollutant: ethyl alcohol

TLV (ug/m3): 1,880,000

Maximum Hourly Emission Rate (lbs/hr): 11.94

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2075.96

MAGLC (ug/m3): 44,762

Pollutant: ethylene glucol monobutyl ether

TLV (ug/m3): 24,000

Maximum Hourly Emission Rate (lbs/hr): 0.76

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 58.66

MAGLC (ug/m3): 571

Pollutant: heptane

TLV (ug/m3): 1,600,000

Maximum Hourly Emission Rate (lbs/hr): 0.60

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2075.96

MAGLC (ug/m3): 38,095

Pollutant: isobutyl acetate

TLV (ug/m3): 700,000

Maximum Hourly Emission Rate (lbs/hr): 0.60

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2075.96

MAGLC (ug/m3): 3571

III. Monitoring and/or Record Keeping Requirements (continued)

Pollutant: isopropyl alcohol

TLV (ug/m3): 980,000

Maximum Hourly Emission Rate (lbs/hr): 14.60

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2075.96

MAGLC (ug/m3): 23333

Pollutant: methyl alcohol

TLV (ug/m3): 260,000

Maximum Hourly Emission Rate (lbs/hr): 10.80

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2075.96

MAGLC (ug/m3): 6190

Pollutant: methyl ethyl ketone

TLV (ug/m3): 590,000

Maximum Hourly Emission Rate (lbs/hr): 14.85

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2075.96

MAGLC (ug/m3): 14,048

Pollutant: methyl isobutyl ketone

TLV (ug/m3): 205,000

Maximum Hourly Emission Rate (lbs/hr): 1.60

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2075.96

MAGLC (ug/m3): 4881

Pollutant: n-propyl alcohol

TLV (ug/m3): 500,000

Maximum Hourly Emission Rate (lbs/hr): 12.40

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2075.96

MAGLC (ug/m3): 11,905

III. Monitoring and/or Record Keeping Requirements (continued)

Pollutant: Toluene

TLV (ug/m3): 375,000

Maximum Hourly Emission Rate (lbs/hr): 9.20

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 2075.96

MAGLC (ug/m3): 8929

Pollutant: xylenes

TLV (ug/m3): 435,000

Maximum Hourly Emission Rate (lbs/hr): 32.63

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 2075.96

MAGLC (ug/m3): 10,357

2. Physical changes to or changes in the method of operation of the emissions unit 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 still 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

3. 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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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