



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

01/20/00

CERTIFIED MAIL

**RE: Final Title V Chapter 3745-77
permit**

01-49-00-0089
STANLEY ELECTRIC US COMPANY
Raefield D. Watkins
420 East High Street
London, OH 43140

Dear Raefield D. Watkins:

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.

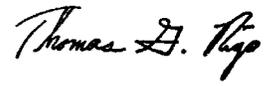
The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office 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 Central District Office.

Very truly yours,

A handwritten signature in black ink that reads "Thomas G. Rigo". The signature is written in a cursive style with a large, prominent initial 'T'.

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

cc: Central District Office



Ohio EPA

State of Ohio Environmental Protection Agency

TITLE V PERMIT

Issue Date: 01/20/00

FINAL ISSUANCE

Effective Date: 01/20/00

Expiration Date: 01/20/05

This document constitutes issuance to:

STANLEY ELECTRIC US COMPANY
420 East High Street
London, OH 43140

of a Title V permit for Facility ID: 01-49-00-0089

Emissions Unit ID (Company ID)/

Emissions Unit Activity Description:

R001 (Under Coat Booth #1)

Undercoat Booth (Coatings A & B) (SE-PA 10-10) (Plastics)

R003 (Topcoat Booth with Infra Red Drying)

SE-PA 20-00, SEPA 20-10 (Plastic)

R004 (Undercoat Application)

Plastic Components Undercoating Booth (SE-PB 10-01)

R006 (Topcoat with Infra Red Dry)

Plastic Components Topcoat Booth (SE-PB 20-01/SE-PB-20-11)

R007 (Undercoat Application)

Plastic Component Undercoating Booth (SE-PC 10-02)

R009 (Topcoat with Infra Red Dry)

Plastic Component Topcoat Booth (SE-PC 20-12)

R010 (Undercoat Application)

Plastic Component Undercoating Booth (SE-PD 10-03)

R012 (Topcoat with Infra Red Dry)

Plastic Component Topcoat Booth (SE-PD 20-13)

R018 (Spray Booth for Primer #1)

Priming Booth #1

R019 (Spray Booth for Hardcoat #2)
Hardcoat Booth #2

R020 (Spray Booth for Hardcoat #3)
Hardcoat Booth #3

R021 (Spray Booth for Primer #4)
Priming Booth #4

R022 (UV Line A)
UV Line A

R023 (UV Line B)
UV Line B

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 3745-77-04(A) 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 Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Central District Office
3232 Alum Creek Drive
PO Box 1049
Columbus, OH 43216-1049
(614) 728-3778

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Recordkeeping 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.
- 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.
- 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 recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and 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.8 below if no deviations occurred during the quarter.
 - iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, 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, recordkeeping, 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.

- 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.

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, 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. (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 upsets.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

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.

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.

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.

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. 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.

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.

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.

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.

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 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.

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.

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 appropriate Ohio EPA District Office or local air agency 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.

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.

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).

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.

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, 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 further clarification, the permittee can refer to Engineering Guide #63 that is available in their STARSHIP software package.)

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.

B. State Only Enforceable Section

1. 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.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable 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:

B001 2.5 MM Btu/hr boiler
B002 1.5 MM Btu/hr boiler
L001 Conveyorized surface cleaner using freon
P001 Plastics Injection Molding
P002 Undercoat drying oven
P003 Undercoat drying oven
P004 Undercoat drying oven
P005 Undercoat drying oven
R002 Powder Coating Booth
R005 Powder Coating Booth
R008 Powder Coating Booth
R011 Powder Coating Booth

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: Under Coat Booth #1 (R001)
Activity Description: Undercoat Booth (Coatings A & B) (SE-PA 10-10) (Plastics)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Undercoat Booth #1	OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 40 pounds/day and 8 pounds/hour when using photochemically reactive materials
	OAC rule 3745-17-11	Particulate emissions shall not exceed 0.551 lb/hr
	OAC rule 3745-17-07	Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The permittee shall operate the water curtain whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - a. the company identification for each coating and photochemically reactive cleanup material employed;
 - b. the number of gallons of each coating and photochemically reactive cleanup material employed;
 - c. the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;
 - d. if a credit to emissions from recovered cleanup materials is to be used in emission calculations, the number of gallons of cleanup material reclaimed for off-site recycle, recovery, and/or disposal from the emissions unit;
 - e. for each day during which a photochemically reactive material is employed, the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;
 - f. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation; and
 - g. for each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (e)/(f), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

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

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day;
 - b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day; and

These 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. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report which states that no deviations occurred during that quarter.

2. The permittee shall notify the Ohio EPA Central District Office in writing of any daily record showing that the water curtain 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 Central District Office within 30 days after the event occurs.

V. Testing Requirements

1. Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Hourly and Daily Emission Limitation for Coating Application

8.0 lbs OC/hour and 40.0 lbs OC/day when using photochemically reactive materials

Applicable Compliance Method

Compliance with the hourly and daily OC limits shall be determined through daily recordkeeping as specified in Section A.III.1. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials. When a photochemically reactive coating or cleanup material is used, daily emissions shall be calculated by multiplying the OC content of each coating and cleanup material used (lbs OC/gallon of material) times each coating and cleanup material's usage each day, and then these emissions shall be summed for all the coatings and cleanup used.

1.b Emission Limitation for Particulate Matter

0.551 lb PM/hr

Applicable Compliance Method

Compliance with the hourly PM limit shall be determined through daily recordkeeping of coating usage, the PM content of each coating, and operating hours per day for the unit. Formulation data from the manufacturer's MSDS shall be used to determine the particulate content of the coatings. Hourly emissions shall be calculated by multiplying the maximum PM content of the coating used in the source (PM/gallon of coating) times the coating's maximum usage in any hour (gallons/hour). If the source has run at the same rate all day, the maximum use in any hour can be calculated by dividing the total use at the end of that day by the hours the source ran during that day. Calculations shall be documented as follows:

PM emissions/hr = (lbs PM/gal of coating) x (coating usage in gal/hr) x (1-TE) x (1-CE) or:

PM emissions/hr = (lbs PM/gal of coating) x (coating usage in gal/day) / (hours of operation) x (1-TE) x (1-CE) and

TE= transfer efficiency (65% for electrostatic application)

CE= capture efficiency (95% for water wash control)

1.c Emission Limitation

Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Undercoat Booth #1	OAC rule 3745-31-05 PTI #01-1492	Organic compound emissions shall not exceed 2.50 lbs/hour; and Organic compound emissions shall not exceed 5.0 tons/yr.

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the coating operation:
 - a. the company identification for each coating and cleanup material employed, and documentation on the chemical content of each;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the organic compound content of each coating and cleanup material applied, in pounds per gallon;
 - d. if a credit to emissions from recovered cleanup materials is to be used in emission calculations, the number of gallons of cleanup material reclaimed for off-site recycle, recovery, and/or disposal from the emissions unit;
 - e. the total organic compound emission rate for all coatings and cleanup materials, in pounds per day;
 - f. the total number of hours the emissions unit was in operation; and
 - g. the average hourly organic compound emission rate for all coatings and cleanup materials, in pounds per hour (average).
2. The permittee shall collect and record the total organic compound emissions for all coatings and cleanup materials, in pounds per month.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each day, during which the average hourly OC emissions from all coatings and cleanup materials employed exceeded 2.5 pounds per hour, and the actual average hourly OC emissions for each such day; and
 - b. the probable cause of any deviations or exceedances, and any corrective actions or preventive measures which have been or will be taken.
2. The permittee shall submit annual reports of the total organic compound emissions from this emissions unit for the previous calendar year. This report shall be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:
 - 1.a Hourly Emission Limitation for Coating Application

2.5 lbs OC/hr

Applicable Compliance Method

Compliance with the hourly OC limit shall be determined through daily recordkeeping as specified in Section B.III.1. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials.
 2. Annual Emission Limitation

5.0 tons OC/yr

Applicable Compliance Method

Compliance with this annual OC limit shall be determined through monthly recordkeeping as specified in Section B.III.2. Annual emissions shall be calculated by adding the monthly emissions.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Topcoat Booth with Infra Red Drying (R003)
Activity Description: SE-PA 20-00, SEPA 20-10 (Plastic)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Topcoat Booth with Infrared Drying Oven	OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 40 pounds/day and 8 pounds/hour when using photochemically reactive materials
	OAC rule 3745-17-11	Particulate emissions shall not exceed 0.551 lb/hr
	OAC rule 3745-17-07	Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The permittee shall operate the water curtain whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - a. the company identification for each coating and photochemically reactive cleanup material employed;
 - b. the number of gallons of each coating and photochemically reactive cleanup material employed;
 - c. the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;
 - d. if a credit to emissions from recovered cleanup materials is to be used in emission calculations, the number of gallons of cleanup material reclaimed for off-site recycle, recovery, and/or disposal from the emissions unit;
 - e. for each day during which a photochemically reactive material is employed, the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;
 - f. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation; and
 - g. for each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (e)/(f), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

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

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day;
 - b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day; and

These 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. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report which states that no deviations occurred during that quarter.

2. The permittee shall notify the Ohio EPA Central District Office in writing of any daily record showing that the water curtain 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 Central District Office within 30 days after the event occurs.

V. Testing Requirements

1. Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Hourly and Daily Emission Limitation for Coating Application

8.0 lbs OC/hour and 40.0 lbs OC/day when using photochemically reactive materials

Applicable Compliance Method

Compliance with the hourly and daily OC limits shall be determined through daily recordkeeping as specified in Section A.III.1. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials. When a photochemically reactive coating or cleanup material is used, daily emissions shall be calculated by multiplying the OC content of each coating and cleanup material used (lbs OC/gallon of material) times each coating and cleanup material's usage each day, and then these emissions shall be summed for all the coatings and cleanup used.

1.b Emission Limitation for Particulate Matter

0.551 lb PM/hr

Applicable Compliance Method

Compliance with the hourly PM limit shall be determined through daily recordkeeping of coating usage, the PM content of each coating, and operating hours per day for the unit. Formulation data from the manufacturer's MSDS shall be used to determine the particulate content of the coatings. Hourly emissions shall be calculated by multiplying the maximum PM content of the coating used in the source (PM/gallon of coating) times the coating's maximum usage in any hour (gallons/hour). If the source has run at the same rate all day, the maximum use in any hour can be calculated by dividing the total use at the end of that day by the hours the source ran during that day. Calculations shall be documented as follows:

PM emissions/hr = (lbs PM/gal of coating) x (coating usage in gal/hr) x (1-TE) x (1-CE) or:

PM emissions/hr = (lbs PM/gal of coating) x (coating usage in gal/day) / (hours of operation) x (1-TE) x (1-CE) and

TE= transfer efficiency (65% for electrostatic application)

CE= capture efficiency (95% for water wash control)

1.c Emission Limitation

Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Topcoat Booth with Infrared Drying Oven	OAC rule 3745-31-05 PTI #01-1492	Organic compound emissions shall not exceed 2.50 lbs/hour; and Organic compound emissions shall not exceed 5.0 tons/yr.

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the coating operation:
 - a. the company identification for each coating and cleanup material employed, and documentation on the chemical content of each;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the organic compound content of each coating and cleanup material applied, in pounds per gallon;
 - d. if a credit to emissions from recovered cleanup materials is to be used in emission calculations, the number of gallons of cleanup material reclaimed for off-site recycle, recovery, and/or disposal from the emissions unit;
 - e. the total organic compound emission rate for all coatings and cleanup materials, in pounds per day;
 - f. the total number of hours the emissions unit was in operation; and
 - g. the average hourly organic compound emission rate for all coatings and cleanup materials, in pounds per hour (average).
2. The permittee shall collect and record the total organic compound emissions for all coatings and cleanup materials, in pounds per month.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each day, during which the average hourly OC emissions from all coatings and cleanup materials employed exceeded 2.5 pounds per hour, and the actual average hourly OC emissions for each such day; and
 - b. the probable cause of any deviations or exceedances, and any corrective actions or preventive measures which have been or will be taken.
2. The permittee shall submit annual reports of the total organic compound emissions from this emissions unit for the previous calendar year. This report shall be satisfied by including this emissions unit in the submission of the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:
 - 1.a Hourly Emission Limitation for Coating Application

2.5 lbs OC/hr

Applicable Compliance Method

Compliance with the hourly OC limit shall be determined through daily recordkeeping as specified in Section B.III.1. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials.
 2. Annual Emission Limitation

5.0 tons OC/yr

Applicable Compliance Method

Compliance with this annual OC limit shall be determined through monthly recordkeeping as specified in B.III.2. Annual emissions shall be calculated by adding the monthly emissions.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Undercoat Application (R004)
Activity Description: Plastic Components Undercoating Booth (SE-PB 10-01)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Undercoat Spray Booth, Line 1	OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 40 pounds/day when using photochemically reactive materials; and The hourly emissions rate requirement is less stringent than the PTI limit
	OAC rule 3745-31-05 Synthetic Minor PTI #01-7415	Organic compound emissions shall not exceed 2.00 lbs/hour; Organic compound emissions shall not exceed 7.30 tons/rolling 12 months; Coating usage shall not exceed 4,062 gallons/rolling 12 months, except as per Section A.I.2.a below; Cleanup usage shall not exceed 240 gallons/yr;
	OAC rule 3745-17-11 OAC rule 3745-17-07	Particulate emissions shall not exceed 0.035 lb/hr; and Particulate emissions shall not exceed 0.153 ton/yr less stringent than PTI limit Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.

2. Additional Terms and Conditions

- 2.a** In order to retain the ability to replace coatings with those of less toxicity and/or with a lower organic compound (OC) content, a new coating, that passes the Air Toxics Policy as described in Section A.VI, and is approved by the Ohio EPA Central District Office, shall be limited in its use as per the following formulas:

$$\text{Maximum coating use/hr (gal/hr)} = (2.00 \text{ lbs OC/hr source limit}) / (y \text{ lbs OC/gal})$$

$$\text{Maximum coating use/yr (gal/yr)} = [(7.30 \text{ tons OC/yr source limit} - 0.17 \text{ tons/yr maximum cleanup emissions}) / (y \text{ lbs OC/gal})] \times (2000 \text{ lbs/ton})$$

$$y = \text{OC content of new coatings by weight (lbs)}$$

Until such a coating is submitted with an analysis for approval, the maximum annual coating usage for the undercoat line, emissions unit R004, shall not exceed 4,062 gallons per rolling 12 months.

II. Operational Restrictions

1. The total cleanup material used in this emissions unit shall not exceed 0.5 gallon in any hour. This limit was established to demonstrate compliance with the Air Toxics Policy.
2. The permittee shall operate the water curtain whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the coating operation:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and each cleanup material employed;
 - c. the total number of gallons of all coatings and total number of gallons of all cleanup materials employed;
 - d. the organic compound content of each coating and cleanup material, in pounds per gallon;
 - e. if a credit to emissions from recovered cleanup materials is to be used in emission calculations, the number of gallons of cleanup material reclaimed for off-site recycle, recovery, and/or disposal from the emissions unit;
 - f. the total organic compound emission rate for all coatings and cleanup materials, in pounds per day for the emissions unit;
 - g. the documentation of whether or not a photochemically reactive material is used on that day;
 - h. the total number of hours the emissions unit was in operation; and
 - i. the average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (f)/(h), in pounds per hour (average).

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

2. The permittee shall collect and record the following information at the end of each month for the emissions unit:
 - a. the total OC emissions from all the coating and cleanup materials used in the emissions unit (lbs OC/month);
 - b. the rolling 12-month summation of total OC emissions from all the coating and cleanup materials used in the emissions unit (tons OC/rolling 12 months);
 - c. the amount of coatings and the amount of cleanup materials used in the emissions unit (gallons/month); and
 - d. the rolling 12-month summation of the amount of coatings used (gallons/rolling 12 months).
3. At the end of each year the permittee shall collect and record the total amount of cleanup material used during the year, less any record of cleanup material sent off-site for recovery, recycle, and/or disposal (gallons/year).
4. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.
5. The permittee shall maintain daily records that document any time periods when the water curtain was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each day, during which the average hourly OC emissions from all coatings and cleanup materials used in the emissions unit exceeded 2.0 pounds per hour, and the actual average hourly OC emissions for each such day;
 - b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from all coatings and cleanup materials used in the emissions unit exceeded 40 pounds per day, and the actual organic compound emissions for each such day;
 - c. an identification of any monthly record showing an exceedance of the 12-month coating usage limitation; and
 - d. an identification of any monthly record showing an exceedance of the annual rolling emission limit, from all coatings and cleanup materials, of 7.3 tons of OC per rolling 12 months.
2. The permittee shall notify the Ohio EPA Central District Office in writing of any daily record showing that the water curtain 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 Central District Office within 30 days after the event occurs.
3. The permittee shall submit annual reports of the total organic compound emissions and the total gallons of cleanup materials used during the previous calendar year. This report shall be satisfied by including this information for this emissions unit in the submission of the annual Fee Emission Report.

V. Testing Requirements

1. Hourly and Daily Emission Limitation for Coating Application

2.0 lbs OC/hour and 40.0 lbs OC/day when using photochemically reactive materials

Applicable Compliance Method

Compliance with the hourly and daily OC limits shall be determined through daily recordkeeping as specified in Section A.III.1. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials. When a photochemically reactive coating or cleanup material is used, daily emissions shall be calculated by multiplying the OC content of each coating and cleanup material used (lbs OC/gallon of material) times each coating and cleanup material's usage each day, and then these emissions shall be summed for all the coatings and cleanup used.

2. Annual Emission Limitation

7.30 tons OC/rolling 12-months

Applicable Compliance Method

Compliance with this annual OC limit shall be determined through monthly recordkeeping as specified in A.III.2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials. Annual emissions shall be calculated by adding the monthly emissions, derived from daily emission calculations from coating and cleanup material use each month. Twelve-month rolling emissions shall be calculated by adding the current monthly emission calculations from the source to the previous 11 month's emission calculations.

3. Annual Rolling Coating and Cleanup Material Usage limitations

4,062 gallons of coating/rolling 12-months

The limit on the coating usage may change as per the formula in Section A.I.2.a, as replacement coatings with lower OC content are approved as required in this permit.

Applicable Compliance Method

Compliance with the coating usage limits shall be determined through monthly recordkeeping of total coating and cleanup material used in this source. Rolling 12-month coating usage in the source shall be calculated each month by adding each new month's usage to the previous rolling 11 months.

4.a Annual Cleanup Material Usage limitations

240 gallons of cleanup material/year

Applicable Compliance Method

Compliance with the cleanup usage limits shall be determined through daily and annual recordkeeping of the cleanup material used. Cleanup materials that are collected for off-site recycle, recovery, and/or disposal shall be subtracted from each monthly record of cleanup use.

4.b Hourly Cleanup Material Usage Limitation

0.5 gallons of cleanup material in any single hour of time

Applicable Compliance Method

Compliance with the maximum cleanup material usage limit shall be determined through daily recordkeeping of the cleanup material used and the hours of operation.

V. Testing Requirements (continued)

5. Emission Limitation for Particulate Matter

0.035 lbs PM/hr
0.153 tons PM/yr

Applicable Compliance Method

Compliance with the hourly PM limit shall be determined through daily recordkeeping of coating usage, the PM content of each coating, and operating hours per day for the unit. Formulation data from the manufacturer's MSDS shall be used to determine the particulate content of the coatings. Hourly emissions shall be calculated by multiplying the maximum PM content of the coating used in the source (2 pounds PM/gallon of coating) times the coating's maximum usage in any hour (gallons/hour). If the source has run at the same rate all day, the maximum use in any hour can be calculated by dividing the total use at the end of that day by the hours the source ran during that day. Calculations shall be documented as follows:

PM emissions/hr = (2.0 lbs PM/gal of coating) x (coating usage in gal/hr) x (1-TE) x (1-CE) or as per above:

PM emissions/hr = (2.0 lbs PM/gal of coating) x (coating usage in gal/day) / (hours of operation) x (1-TE) x (1-CE) and

Annual PM emissions (tons/yr) = (2.0 lbs PM/gal of coating) x (coating usage in gal/year) x (1-TE) x (1-CE) / (2000 lbs/ton)

TE= transfer efficiency (65% for electrostatic application)

CE= capture efficiency (95% for water wash control)

6. Emission Limitation

Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

1. Toxics Policy Requirement

This permit allows the use of coatings and cleanup materials specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Toluene
TLV: 188 mg/m³:
Maximum Hourly Emission Rate: 3.88 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 1,166 ug/m³:
MAGLC: 4,476 ug/m³

Pollutant: Xylene
TLV: 434 mg/m³
Maximum Hourly Emission Rate: 1.31 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 394 ug/m³:
MAGLC: 10,333 ug/m³

Pollutant: n-Butyl Alcohol
TLV: 152 mg/m³
Maximum Hourly Emission Rate: 3.78 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 1,135 ug/m³:
MAGLC: 3,619 ug/m³

Pollutant: Methylcyclohexane
TLV: 1,610 mg/m³
Maximum Hourly Emission Rate: 9.07 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 2,726 ug/m³:
MAGLC: 38,333 ug/m³

Pollutant: Diacetone Alcohol
TLV: 238 mg/m³
Maximum Hourly Emission Rate: 1.44 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 432 ug/m³:
MAGLC: 5,666 ug/m³

Pollutant: Ethyl Acetate
TLV: 1,440 mg/m³
Maximum Hourly Emission Rate: 2.51 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 754 ug/m³:
MAGLC: 34,286 ug/m³

VI. Miscellaneous Requirements (continued)

Pollutant: Isopropyl Alcohol
TLV: 983 mg/m³
Maximum Hourly Emission Rate: 3.78 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 1,135 ug/m³:
MAGLC: 23,405 ug/m³

Pollutant: Methanol
TLV: 262 mg/m³
Maximum Hourly Emission Rate: 3.78 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 1,135 ug/m³:
MAGLC: 6,238 ug/m³

2. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":
 - 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 specified in the above table;
 - b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
 - c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
 - d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.
3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
 - a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
 - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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Undercoat Spray
Booth, Line 1

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: Topcoat with Infra Red Dry (R006)
Activity Description: Plastic Components Topcoat Booth (SE-PB 20-01/SE-PB-20-11)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Topcoat Booth with infrared drying oven	OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 40 pounds/day and 8 pounds/hour when using photochemically reactive materials
	OAC rule 3745-17-11	Particulate emissions shall not exceed 0.551 lb/hr
	OAC rule 3745-17-07	Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The permittee shall operate the water curtain whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - a. the company identification for each coating and photochemically reactive cleanup material employed;
 - b. the number of gallons of each coating and photochemically reactive cleanup material employed;
 - c. the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;
 - d. if a credit to emissions from recovered cleanup materials is to be used in emission calculations, the number of gallons of cleanup material reclaimed for off-site recycle, recovery, and/or disposal from the emissions unit;
 - e. for each day during which a photochemically reactive material is employed, the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;
 - f. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation; and
 - g. for each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (e)/(f), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

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

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day;
 - b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day; and
 - c. the identification of any daily record showing that the water wash control system was not in service when the emissions unit was in operation.

These 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. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report which states that no deviations occurred during that quarter.

2. The permittee shall notify the Ohio EPA Central District Office in writing of any daily record showing that the water curtain 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 Central District Office within 30 days after the event occurs.

V. Testing Requirements

1. Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Hourly and Daily Emission Limitation for Coating Application

8.0 lbs OC/hour and 40.0 lbs OC/day when using photochemically reactive materials

Applicable Compliance Method

Compliance with the hourly and daily OC limits shall be determined through daily recordkeeping as specified in Section A.III.1. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials. When a photochemically reactive coating or cleanup material is used, daily emissions shall be calculated by multiplying the OC content of each coating and cleanup material used (lbs OC/gallon of material) times each coating and cleanup material's usage each day, and then these emissions shall be summed for all the coatings and cleanup used.

1.b Emission Limitation for Particulate Matter

0.551 lb PM/hr

Applicable Compliance Method

Compliance with the hourly PM limit shall be determined through daily recordkeeping of coating usage, the PM content of each coating, and operating hours per day for the unit. Formulation data from the manufacturer's MSDS shall be used to determine the particulate content of the coatings. Hourly emissions shall be calculated by multiplying the maximum PM content of the coating used in the source (PM/gallon of coating) times the coating's maximum usage in any hour (gallons/hour). If the source has run at the same rate all day, the maximum use in any hour can be calculated by dividing the total use at the end of that day by the hours the source ran during that day. Calculations shall be documented as follows:

PM emissions/hr = (lbs PM/gal of coating) x (coating usage in gal/hr) x (1-TE) x (1-CE) or:

PM emissions/hr = (lbs PM/gal of coating) x (coating usage in gal/day) / (hours of operation) x (1-TE) x (1-CE) and

TE= transfer efficiency (65% for electrostatic application)

CE= capture efficiency (95% for water wash control)

1.c Emission Limitation

Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Topcoat Booth with infrared drying oven	OAC rule 3745-31-05 PTI #01-2202	Organic compound emissions shall not exceed 4.0 tons/yr.

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the coating operation:
 - a. the company identification for each coating and cleanup material employed, and documentation on the chemical content of each;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the organic compound content of each coating and cleanup material applied, in pounds per gallon;
 - d. if a credit to emissions from recovered cleanup materials is to be used in the annual emission calculations, the number of gallons of cleanup material reclaimed for off-site recycle, recovery, and/or disposal from the emissions unit; and
 - e. the total organic compound emissions for all coating and cleanup materials, in pounds per month.

IV. Reporting Requirements

1. The permittee shall submit annual reports of the total organic compound emissions from this source for the previous calendar year. This report shall be satisfied by including this source in the submission of the annual Fee Emission Report.

V. Testing Requirements

1. Annual Emission Limitation

4.0 tons OC/yr

Applicable Compliance Method

Compliance with this annual OC limit shall be determined through monthly recordkeeping as specified in Section B.III.1. Annual emissions shall be calculated by adding the monthly emissions.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Undercoat Application (R007)
Activity Description: Plastic Component Undercoating Booth (SE-PC 10-02)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Undercoat Spray Booth, Line 3	OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 40 pounds/day when using photochemically reactive materials; and The hourly emissions rate requirement is less stringent than the PTI limit
	OAC rule 3745-31-05 Synthetic Minor PTI #01-7415	Organic compound emissions shall not exceed 2.00 lbs/hour; Organic compound emissions shall not exceed 7.30 tons/rolling 12 months; Coating usage shall not exceed 4,062 gallons/rolling 12 months, except as per Section A.I.2.a below; Cleanup usage shall not exceed 240 gallons/yr;
	OAC rule 3745-17-11 OAC rule 3745-17-07	Particulate emissions shall not exceed 0.035 lb/hr; and Particulate emissions shall not exceed 0.153 ton/yr less stringent than PTI limit Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.

2. Additional Terms and Conditions

- 2.a** In order to retain the ability to replace coatings with those of less toxicity and/or with a lower organic compound (OC) content, a new coating, that passes the Air Toxics Policy as described in Section A.VI, and is approved by the Ohio EPA Central District Office, shall be limited in its use as per the following formulas:

$$\text{Maximum coating use/hr (gal/hr)} = (2.00 \text{ lbs OC/hr source limit}) / (y \text{ lbs OC/gal})$$

$$\text{Maximum coating use/yr (gal/yr)} = [(7.30 \text{ tons OC/yr source limit} - 0.17 \text{ tons/yr maximum cleanup emissions}) / (y \text{ lbs OC/gal})] \times (2000 \text{ lbs/ton})$$

$$y = \text{OC content of new coatings by weight (lbs)}$$

Until such a coating is submitted with an analysis for approval, the maximum annual coating usage for the undercoat line, emissions unit R004, shall not exceed 4,062 gallons per rolling 12 months.

II. Operational Restrictions

1. The total cleanup material used in this emissions unit shall not exceed 0.5 gallon in any hour. This limit was established to demonstrate compliance with the Air Toxics Policy.
2. The permittee shall operate the water curtain whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the coating operation:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and each cleanup material employed;
 - c. the total number of gallons of all coatings and total number of gallons of all cleanup materials employed;
 - d. the organic compound content of each coating and cleanup material, in pounds per gallon;
 - e. if a credit to emissions from recovered cleanup materials is to be used in emission calculations, the number of gallons of cleanup material reclaimed for off-site recycle, recovery, and/or disposal from the emissions unit;
 - f. the total organic compound emission rate for all coatings and cleanup materials, in pounds per day for the emissions unit;
 - g. the documentation of whether or not a photochemically reactive material is used on that day;
 - h. the total number of hours the emissions unit was in operation; and
 - i. the average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (f)/(h), in pounds per hour (average).

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

2. The permittee shall collect and record the following information at the end of each month for the emissions unit:
 - a. the total OC emissions from all the coating and cleanup materials used in the emissions unit (lbs OC/month);
 - b. the rolling 12-month summation of total OC emissions from all the coating and cleanup materials used in the emissions unit (tons OC/rolling 12 months);
 - c. the amount of coatings and the amount of cleanup materials used in the emissions unit (gallons/month); and
 - d. the rolling 12-month summation of the amount of coatings used (gallons/rolling 12 months).
3. At the end of each year the permittee shall collect and record the total amount of cleanup material used during the year, less any record of cleanup material sent off-site for recovery, recycle, and/or disposal (gallons/year).
4. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.
5. The permittee shall maintain daily records that document any time periods when the water curtain was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each day, during which the average hourly OC emissions from all coatings and cleanup materials used in the emissions unit exceeded 2.0 pounds per hour, and the actual average hourly OC emissions for each such day;
 - b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from all coatings and cleanup materials used in the emissions unit exceeded 40 pounds per day, and the actual organic compound emissions for each such day;
 - c. an identification of any monthly record showing an exceedance of the rolling 12-month coating usage limitation; and
 - d. an identification of any monthly record showing an exceedance of the annual rolling emission limit, from all coatings and cleanup materials, of 7.3 tons of OC per rolling 12 months.
2. The permittee shall notify the Ohio EPA Central District Office in writing of any daily record showing that the water curtain 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 Central District Office within 30 days after the event occurs.
3. The permittee shall submit annual reports of the total organic compound emissions and the total gallons of cleanup materials used during the previous calendar year. This report shall be satisfied by including this information for this emissions unit in the submission of the annual Fee Emission Report.

V. Testing Requirements

1. Hourly and Daily Emission Limitation for Coating Application

2.0 lbs OC/hour and 40.0 lbs OC/day when using photochemically reactive materials

Applicable Compliance Method

Compliance with the hourly and daily OC limits shall be determined through daily recordkeeping as specified in Section A.III.1. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials. When a photochemically reactive coating or cleanup material is used, daily emissions shall be calculated by multiplying the OC content of each coating and cleanup material used (lbs OC/gallon of material) times each coating and cleanup material's usage each day, and then these emissions shall be summed for all the coatings and cleanup used.

2. Annual Emission Limitation

7.30 tons OC/rolling 12-months

Applicable Compliance Method

Compliance with this annual OC limit shall be determined through monthly recordkeeping as specified in A.III.2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials. Annual emissions shall be calculated by adding the monthly emissions, derived from daily emission calculations from coating and cleanup material use each month. Twelve-month rolling emissions shall be calculated by adding the current monthly emission calculations from the source to the previous 11 month's emission calculations.

3. Annual Rolling Coating and Cleanup Material Usage limitations

4,062 gallons of coating/rolling 12-months

The limit on the coating usage may change as per the formula in Section A.I.2.a, as replacement coatings with lower OC content are approved as required in this permit.

Applicable Compliance Method

Compliance with the coating usage limits shall be determined through monthly recordkeeping of total coating and cleanup material used in this source. Rolling 12-month coating usage in the source shall be calculated each month by adding each new month's usage to the previous rolling 11 months.

4.a Annual Cleanup Material Usage limitations

240 gallons of cleanup material/year

Applicable Compliance Method

Compliance with the cleanup usage limits shall be determined through daily and annual recordkeeping of the cleanup material used. Cleanup materials that are collected for off-site recycle, recovery, and/or disposal shall be subtracted from each monthly record of cleanup use.

4.b Hourly Cleanup Material Usage Limitation

0.5 gallons of cleanup material in any single hour of time

Applicable Compliance Method

Compliance with the maximum cleanup material usage limit shall be determined through daily recordkeeping of the cleanup material used and the hours of operation.

V. Testing Requirements (continued)

5. Emission Limitation for Particulate Matter

0.035 lbs PM/hr
0.153 tons PM/yr

Applicable Compliance Method

Compliance with the hourly PM limit shall be determined through daily recordkeeping of coating usage, the PM content of each coating, and operating hours per day for the unit. Formulation data from the manufacturer's MSDS shall be used to determine the particulate content of the coatings. Hourly emissions shall be calculated by multiplying the maximum PM content of the coating used in the source (2 pounds PM/gallon of coating) times the coating's maximum usage in any hour (gallons/hour). If the source has run at the same rate all day, the maximum use in any hour can be calculated by dividing the total use at the end of that day by the hours the source ran during that day. Calculations shall be documented as follows:

PM emissions/hr = (2.0 lbs PM/gal of coating) x (coating usage in gal/hr) x (1-TE) x (1-CE) or as per above:

PM emissions/hr = (2.0 lbs PM/gal of coating) x (coating usage in gal/day) / (hours of operation) x (1-TE) x (1-CE) and

Annual PM emissions (tons/yr) = (2.0 lbs PM/gal of coating) x (coating usage in gal/year) x (1-TE) x (1-CE) / (2000 lbs/ton)

TE= transfer efficiency (65% for electrostatic application)

CE= capture efficiency (95% for water wash control)

6. Emission Limitation

Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

1. Toxics Policy Requirement

This permit allows the use of coatings and cleanup materials specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Toluene
TLV: 188 mg/m³:
Maximum Hourly Emission Rate: 3.88 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 1,166 ug/m³:
MAGLC: 4,476 ug/m³

Pollutant: Xylene
TLV: 434 mg/m³
Maximum Hourly Emission Rate: 1.31 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 394 ug/m³:
MAGLC: 10,333 ug/m³

Pollutant: n-Butyl Alcohol
TLV: 152 mg/m³
Maximum Hourly Emission Rate: 3.78 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 1,135 ug/m³:
MAGLC: 3,619 ug/m³

Pollutant: Methylcyclohexane
TLV: 1,610 mg/m³
Maximum Hourly Emission Rate: 9.07 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 2,726 ug/m³:
MAGLC: 38,333 ug/m³

Pollutant: Diacetone Alcohol
TLV: 238 mg/m³
Maximum Hourly Emission Rate: 1.44 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 432 ug/m³:
MAGLC: 5,666 ug/m³

Pollutant: Ethyl Acetate
TLV: 1,440 mg/m³
Maximum Hourly Emission Rate: 2.51 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 754 ug/m³:
MAGLC: 34,286 ug/m³

VI. Miscellaneous Requirements (continued)

Pollutant: Isopropyl Alcohol
TLV: 983 mg/m³
Maximum Hourly Emission Rate: 3.78 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 1,135 ug/m³:
MAGLC: 23,405 ug/m³

Pollutant: Methanol
TLV: 262 mg/m³
Maximum Hourly Emission Rate: 3.78 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 1,135 ug/m³:
MAGLC: 6,238 ug/m³

2. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":
 - 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 specified in the above table;
 - b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
 - c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
 - d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.
3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
 - a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
 - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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Undercoat Spray
Booth, Line 3

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: Topcoat with Infra Red Dry (R009)
Activity Description: Plastic Component Topcoat Booth (SE-PC 20-12)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Topcoat Booth with infrared drying oven	OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 40 pounds/day and 8 pounds/hour when using photochemically reactive materials
	OAC rule 3745-17-11	Particulate emissions shall not exceed 0.551 lb/hr
	OAC rule 3745-17-07	Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The permittee shall operate the water curtain whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - a. the company identification for each coating and photochemically reactive cleanup material employed;
 - b. the number of gallons of each coating and photochemically reactive cleanup material employed;
 - c. the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;
 - d. if a credit to emissions from recovered cleanup materials is to be used in emission calculations, the number of gallons of cleanup material reclaimed for off-site recycle, recovery, and/or disposal from the emissions unit;
 - e. for each day during which a photochemically reactive material is employed, the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;
 - f. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation; and
 - g. for each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (e)/(f), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

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

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day;
 - b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day; and
 - c. the identification of any daily record showing that the water wash control system was not in service when the emissions unit was in operation.

These 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. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report which states that no deviations occurred during that quarter.

2. The permittee shall notify the Ohio EPA Central District Office in writing of any daily record showing that the water curtain 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 Central District Office within 30 days after the event occurs.

V. Testing Requirements

1. Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Hourly and Daily Emission Limitation for Coating Application

8.0 lbs OC/hour and 40.0 lbs OC/day when using photochemically reactive materials

Applicable Compliance Method

Compliance with the hourly and daily OC limits shall be determined through daily recordkeeping as specified in Section A.III.1. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials. When a photochemically reactive coating or cleanup material is used, daily emissions shall be calculated by multiplying the OC content of each coating and cleanup material used (lbs OC/gallon of material) times each coating and cleanup material's usage each day, and then these emissions shall be summed for all the coatings and cleanup used.

1.b Emission Limitation for Particulate Matter

0.551 lb PM/hr

Applicable Compliance Method

Compliance with the hourly PM limit shall be determined through daily recordkeeping of coating usage, the PM content of each coating, and operating hours per day for the unit. Formulation data from the manufacturer's MSDS shall be used to determine the particulate content of the coatings. Hourly emissions shall be calculated by multiplying the maximum PM content of the coating used in the source (PM/gallon of coating) times the coating's maximum usage in any hour (gallons/hour). If the source has run at the same rate all day, the maximum use in any hour can be calculated by dividing the total use at the end of that day by the hours the source ran during that day. Calculations shall be documented as follows:

PM emissions/hr = (lbs PM/gal of coating) x (coating usage in gal/hr) x (1-TE) x (1-CE) or:

PM emissions/hr = (lbs PM/gal of coating) x (coating usage in gal/day) / (hours of operation) x (1-TE) x (1-CE) and

TE= transfer efficiency (65% for electrostatic application)

CE= capture efficiency (95% for water wash control)

1.c Emission Limitation

Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Topcoat Booth with infrared drying oven	OAC rule 3745-31-05 PTI #01-2202	Organic compound emissions shall not exceed 4.0 tons/yr.

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the coating operation:
 - a. the company identification for each coating and cleanup material employed, and documentation on the chemical content of each;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the organic compound content of each coating and cleanup material applied, in pounds per gallon;
 - d. if a credit to emissions from recovered cleanup materials is to be used in the annual emission calculations, the number of gallons of cleanup material reclaimed for off-site recycle, recovery, and/or disposal from the emissions unit; and
 - e. the total organic compound emissions for all coating and cleanup materials, in pounds per month.

IV. Reporting Requirements

1. The permittee shall submit annual reports of the total organic compound emissions from this source for the previous calendar year. This report shall be satisfied by including this source in the submission of the annual Fee Emission Report.

Facility Name: **STANLEY ELECTRIC US COMPANY**

Facility ID: **01-49-00-0089**

Emissions Unit: **Topcoat with Infra Red Dry (R009)**

V. Testing Requirements

1. Annual Emission Limitation

4.0 tons OC/yr

Applicable Compliance Method

Compliance with this annual OC limit shall be determined through monthly recordkeeping as specified in Section B.III.1. Annual emissions shall be calculated by adding the monthly emissions.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Undercoat Application (R010)
Activity Description: Plastic Component Undercoating Booth (SE-PD 10-03)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Undercoat Spray Booth, Line 4	OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 40 pounds/day when using photochemically reactive materials; and The hourly emissions rate requirement is less stringent than the PTI limit
	OAC rule 3745-31-05 Synthetic Minor PTI #01-7415	Organic compound emissions shall not exceed 2.00 lbs/hour; Organic compound emissions shall not exceed 7.30 tons/rolling 12 months; Coating usage shall not exceed 4,062 gallons/rolling 12 months, except as per Section A.I.2.a below; Cleanup usage shall not exceed 240 gallons/yr;
	OAC rule 3745-17-11 OAC rule 3745-17-07	Particulate emissions shall not exceed 0.035 lb/hr; and Particulate emissions shall not exceed 0.153 ton/yr less stringent than PTI limit Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.

2. Additional Terms and Conditions

- 2.a** In order to retain the ability to replace coatings with those of less toxicity and/or with a lower organic compound (OC) content, a new coating, that passes the Air Toxics Policy as described in Section A.VI, and is approved by the Ohio EPA Central District Office, shall be limited in its use as per the following formulas:

$$\text{Maximum coating use/hr (gal/hr)} = (2.00 \text{ lbs OC/hr source limit}) / (y \text{ lbs OC/gal})$$

$$\text{Maximum coating use/yr (gal/yr)} = [(7.30 \text{ tons OC/yr source limit} - 0.17 \text{ tons/yr maximum cleanup emissions}) / (y \text{ lbs OC/gal})] \times (2000 \text{ lbs/ton})$$

$$y = \text{OC content of new coatings by weight (lbs)}$$

Until such a coating is submitted with an analysis for approval, the maximum annual coating usage for the undercoat line, emissions unit R004, shall not exceed 4,062 gallons per rolling 12 months.

II. Operational Restrictions

1. The total cleanup material used in this emissions unit shall not exceed 0.5 gallon in any hour. This limit was established to demonstrate compliance with the Air Toxics Policy.
2. The permittee shall operate the water curtain whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the coating operation:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and each cleanup material employed;
 - c. the total number of gallons of all coatings and total number of gallons of all cleanup materials employed;
 - d. the organic compound content of each coating and cleanup material, in pounds per gallon;
 - e. if a credit to emissions from recovered cleanup materials is to be used in emission calculations, the number of gallons of cleanup material reclaimed for off-site recycle, recovery, and/or disposal from the emissions unit;
 - f. the total organic compound emission rate for all coatings and cleanup materials, in pounds per day for the emissions unit;
 - g. the documentation of whether or not a photochemically reactive material is used on that day;
 - h. the total number of hours the emissions unit was in operation; and
 - i. the average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (f)/(h), in pounds per hour (average).

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

2. The permittee shall collect and record the following information at the end of each month for the emissions unit:
 - a. the total OC emissions from all the coating and cleanup materials used in the emissions unit (lbs OC/month);
 - b. the rolling 12-month summation of total OC emissions from all the coating and cleanup materials used in the emissions unit (tons OC/rolling 12 months);
 - c. the amount of coatings and the amount of cleanup materials used in the emissions unit (gallons/month); and
 - d. the rolling 12-month summation of the amount of coatings used (gallons/rolling 12 months).
3. At the end of each year the permittee shall collect and record the total amount of cleanup material used during the year, less any record of cleanup material sent off-site for recovery, recycle, and/or disposal (gallons/year).
4. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.
5. The permittee shall maintain daily records that document any time periods when the water curtain was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each day, during which the average hourly OC emissions from all coatings and cleanup materials used in the emissions unit exceeded 2.0 pounds per hour, and the actual average hourly OC emissions for each such day;
 - b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from all coatings and cleanup materials used in the emissions unit exceeded 40 pounds per day, and the actual organic compound emissions for each such day;
 - c. an identification of any monthly record showing an exceedance of the rolling 12-month coating usage limitation; and
 - d. an identification of any monthly record showing an exceedance of the annual rolling emission limit, from all coatings and cleanup materials, of 7.3 tons of OC per rolling 12 months.
2. The permittee shall notify the Ohio EPA Central District Office in writing of any daily record showing that the water curtain 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 Central District Office within 30 days after the event occurs.
3. The permittee shall submit annual reports of the total organic compound emissions and the total gallons of cleanup materials used during the previous calendar year. This report shall be satisfied by including this information for this emissions unit in the submission of the annual Fee Emission Report.

V. Testing Requirements

1. Hourly and Daily Emission Limitation for Coating Application

2.0 lbs OC/hour and 40.0 lbs OC/day when using photochemically reactive materials

Applicable Compliance Method

Compliance with the hourly and daily OC limits shall be determined through daily recordkeeping as specified in Section A.III.1. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials. When a photochemically reactive coating or cleanup material is used, daily emissions shall be calculated by multiplying the OC content of each coating and cleanup material used (lbs OC/gallon of material) times each coating and cleanup material's usage each day, and then these emissions shall be summed for all the coatings and cleanup used.

2. Annual Emission Limitation

7.30 tons OC/rolling 12-months

Applicable Compliance Method

Compliance with this annual OC limit shall be determined through monthly recordkeeping as specified in A.III.2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials. Annual emissions shall be calculated by adding the monthly emissions, derived from daily emission calculations from coating and cleanup material use each month. Twelve-month rolling emissions shall be calculated by adding the current monthly emission calculations from the source to the previous 11 month's emission calculations.

3. Annual Rolling Coating and Cleanup Material Usage limitations

4,062 gallons of coating/rolling 12-months

The limit on the coating usage may change as per the formula in Section A.I.2.a, as replacement coatings with lower OC content are approved as required in this permit.

Applicable Compliance Method

Compliance with the coating usage limits shall be determined through monthly recordkeeping of total coating and cleanup material used in this source. Rolling 12-month coating usage in the source shall be calculated each month by adding each new month's usage to the previous rolling 11 months.

4.a Annual Cleanup Material Usage limitations

240 gallons of cleanup material/year

Applicable Compliance Method

Compliance with the cleanup usage limits shall be determined through daily and annual recordkeeping of the cleanup material used. Cleanup materials that are collected for off-site recycle, recovery, and/or disposal shall be subtracted from each monthly record of cleanup use.

4.b Hourly Cleanup Material Usage Limitation

0.5 gallons of cleanup material in any single hour of time

Applicable Compliance Method

Compliance with the maximum cleanup material usage limit shall be determined through daily recordkeeping of the cleanup material used and the hours of operation.

V. Testing Requirements (continued)

5.a Emission Limitation for Particulate Matter

0.035 lbs PM/hr
0.153 tons PM/yr

Applicable Compliance Method

Compliance with the hourly PM limit shall be determined through daily recordkeeping of coating usage, the PM content of each coating, and operating hours per day for the unit. Formulation data from the manufacturer's MSDS shall be used to determine the particulate content of the coatings. Hourly emissions shall be calculated by multiplying the maximum PM content of the coating used in the source (2 pounds PM/gallon of coating) times the coating's maximum usage in any hour (gallons/hour). If the source has run at the same rate all day, the maximum use in any hour can be calculated by dividing the total use at the end of that day by the hours the source ran during that day. Calculations shall be documented as follows:

PM emissions/hr = (2.0 lbs PM/gal of coating) x (coating usage in gal/hr) x (1-TE) x (1-CE) or as per above:

PM emissions/hr = (2.0 lbs PM/gal of coating) x (coating usage in gal/day) / (hours of operation) x (1-TE) x (1-CE) and

Annual PM emissions (tons/yr) = (2.0 lbs PM/gal of coating) x (coating usage in gal/year) x (1-TE) x (1-CE) / (2000 lbs/ton)

TE= transfer efficiency (65% for electrostatic application)

CE= capture efficiency (95% for water wash control)

6. Emission Limitation

Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

1. Toxics Policy Requirement

This permit allows the use of coatings and cleanup materials specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Toluene
TLV: 188 mg/m³:
Maximum Hourly Emission Rate: 3.88 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 1,166 ug/m³:
MAGLC: 4,476 ug/m³

Pollutant: Xylene
TLV: 434 mg/m³
Maximum Hourly Emission Rate: 1.31 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 394 ug/m³:
MAGLC: 10,333 ug/m³

Pollutant: n-Butyl Alcohol
TLV: 152 mg/m³
Maximum Hourly Emission Rate: 3.78 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 1,135 ug/m³:
MAGLC: 3,619 ug/m³

Pollutant: Methylcyclohexane
TLV: 1,610 mg/m³
Maximum Hourly Emission Rate: 9.07 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 2,726 ug/m³:
MAGLC: 38,333 ug/m³

Pollutant: Diacetone Alcohol
TLV: 238 mg/m³
Maximum Hourly Emission Rate: 1.44 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 432 ug/m³:
MAGLC: 5,666 ug/m³

Pollutant: Ethyl Acetate
TLV: 1,440 mg/m³
Maximum Hourly Emission Rate: 2.51 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 754 ug/m³:
MAGLC: 34,286 ug/m³

VI. Miscellaneous Requirements (continued)

Pollutant: Isopropyl Alcohol
TLV: 983 mg/m³
Maximum Hourly Emission Rate: 3.78 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 1,135 ug/m³:
MAGLC: 23,405 ug/m³

Pollutant: Methanol
TLV: 262 mg/m³
Maximum Hourly Emission Rate: 3.78 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 1,135 ug/m³:
MAGLC: 6,238 ug/m³

2. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":
 - 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 specified in the above table;
 - b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
 - c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
 - d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.
3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
 - a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
 - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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Undercoat Spray
Booth, Line 4

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: Topcoat with Infra Red Dry (R012)
Activity Description: Plastic Component Topcoat Booth (SE-PD 20-13)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Topcoat Booth with infrared drying oven	OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 40 pounds/day and 8 pounds/hour when using photochemically reactive materials
	OAC rule 3745-17-11	Particulate emissions shall not exceed 0.551 lb/hr
	OAC rule 3745-17-07	Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The permittee shall operate the water curtain whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - a. the company identification for each coating and photochemically reactive cleanup material employed;
 - b. the number of gallons of each coating and photochemically reactive cleanup material employed;
 - c. the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;
 - d. if a credit to emissions from recovered cleanup materials is to be used in emission calculations, the number of gallons of cleanup material reclaimed for off-site recycle, recovery, and/or disposal from the emissions unit;
 - e. for each day during which a photochemically reactive material is employed, the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;
 - f. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation; and
 - g. for each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (e)/(f), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

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

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

These 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. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report which states that no deviations occurred during that quarter.

2. The permittee shall notify the Ohio EPA Central District Office in writing of any daily record showing that the water curtain 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 Central District Office within 30 days after the event occurs.

V. Testing Requirements

1. Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Hourly and Daily Emission Limitation for Coating Application

8.0 lbs OC/hour and 40.0 lbs OC/day when using photochemically reactive materials

Applicable Compliance Method

Compliance with the hourly and daily OC limits shall be determined through daily recordkeeping as specified in Section A.III.1. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials. When a photochemically reactive coating or cleanup material is used, daily emissions shall be calculated by multiplying the OC content of each coating and cleanup material used (lbs OC/gallon of material) times each coating and cleanup material's usage each day, and then these emissions shall be summed for all the coatings and cleanup used.

1.b Emission Limitation for Particulate Matter

0.551 lb PM/hr

Applicable Compliance Method

Compliance with the hourly PM limit shall be determined through daily recordkeeping of coating usage, the PM content of each coating, and operating hours per day for the unit. Formulation data from the manufacturer's MSDS shall be used to determine the particulate content of the coatings. Hourly emissions shall be calculated by multiplying the maximum PM content of the coating used in the source (PM/gallon of coating) times the coating's maximum usage in any hour (gallons/hour). If the source has run at the same rate all day, the maximum use in any hour can be calculated by dividing the total use at the end of that day by the hours the source ran during that day. Calculations shall be documented as follows:

PM emissions/hr = (lbs PM/gal of coating) x (coating usage in gal/hr) x (1-TE) x (1-CE) or:

PM emissions/hr = (lbs PM/gal of coating) x (coating usage in gal/day) / (hours of operation) x (1-TE) x (1-CE) and

TE= transfer efficiency (65% for electrostatic application)

CE= capture efficiency (95% for water wash control)

1.c Emission Limitation

Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Topcoat Booth with infrared drying oven	OAC rule 3745-31-05 PTI #01-2202	Organic compound emissions shall not exceed 4.0 tons/yr.

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the coating operation:
 - a. the company identification for each coating and cleanup material employed, and documentation on the chemical content of each;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the organic compound content of each coating and cleanup material applied, in pounds per gallon;
 - d. if a credit to emissions from recovered cleanup materials is to be used in the annual emission calculations, the number of gallons of cleanup material reclaimed for off-site recycle, recovery, and/or disposal from the emissions unit; and
 - e. the total organic compound emissions for all coating and cleanup materials, in pounds per month.

IV. Reporting Requirements

1. The permittee shall submit annual reports of the total organic compound emissions from this source for the previous calendar year. This report shall be satisfied by including this source in the submission of the annual Fee Emission Report.

V. Testing Requirements

1. Annual Emission Limitation

4.0 tons OC/yr

Applicable Compliance Method

Compliance with this annual OC limit shall be determined through monthly recordkeeping as specified in Section B.III.1. Annual emissions shall be calculated by adding the monthly emissions.

Facility Name: **STANLEY ELECTRIC US COMPANY**

Facility ID: **01-49-00-0089**

Emissions Unit: **Topcoat with Infra Red Dry (R012)**

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Spray Booth for Primer #1 (R018)
Activity Description: Priming Booth #1

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Primer Spray Booth # 1	OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 40 pounds/day when using photochemically reactive materials; and The hourly emissions rate requirement is less stringent than the PTI limit
	OAC rule 3745-31-05 Synthetic Minor PTI #01-7415	Organic compound emissions shall not exceed 4.80 lbs/hour; Organic compound emissions shall not exceed 7.30 tons/rolling 12 months when using photochemically reactive materials; Organic compound emissions shall not exceed 11.13 tons/rolling 12 months; Coating usage shall not exceed 2,750 gallons/rolling 12 months, except as per Section A.I.2.a below; Cleanup usage shall not exceed 408 gallons/yr; Particulate emissions shall not exceed 0.035 lb/hr; and Particulate emissions shall not exceed 0.153 ton/yr less stringent than the PTI limit
	OAC rule 3745-17-11	

**Operations, Property,
and/or Equipment**

**Applicable Rules/
Requirements**

**Applicable Emissions
Limitations/Control
Measures**

OAC rule 3745-17-07

Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.

2. Additional Terms and Conditions

- 2.a** In order to retain the ability to replace coatings with those of less toxicity and/or with a lower organic compound (OC) content, a new coating, that passes the Air Toxics Policy as described in Section A.VI, and is approved by the Ohio EPA Central District Office, shall be limited in its use as per the following formulas:

Maximum coating use/hr (gal/hr) = (4.80 lbs OC/hr source limit) / (y lbs OC/gal)

Maximum coating use/yr (gal/yr) = [(11.13 tons OC/yr source limit - 0.13 tons/yr maximum cleanup emissions/yr)] / (y lbs.OC/gal) x (2000 lbs/ton)

y = OC content of new coatings by weight (lbs)

Until such a coating is submitted with an analysis for approval, the maximum annual coating usage for the primer line, emissions unit R018, shall not exceed 2,750 gallons per rolling 12 months.

II. Operational Restrictions

1. The total cleanup material used in this emissions unit shall not exceed 0.5 gallon in any hour. This limit was established to demonstrate compliance with the Air Toxics Policy.
2. The permittee shall operate the water curtain whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the coating operation:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and each cleanup material employed;
 - c. the total number of gallons of all coatings and total number of gallons of all cleanup materials employed;
 - d. the organic compound content of each coating and cleanup material, in pounds per gallon;
 - e. if a credit to emissions from recovered cleanup materials is to be used in emission calculations, the number of gallons of cleanup material reclaimed for off-site recycle, recovery, and/or disposal from the emissions unit;
 - f. the total organic compound emission rate for all coatings and cleanup materials, in pounds per day for the emissions unit;
 - g. the documentation of whether or not a photochemically reactive material is used on that day;
 - h. the total number of hours the emissions unit was in operation; and
 - i. the average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (f)/(h), in pounds per hour (average).

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

2. The permittee shall collect and record the following information at the end of each month for the emissions unit:
 - a. the total OC emissions from all the coating and cleanup materials used in the emissions unit (lbs OC/month);
 - b. the rolling 12-month summation of OC emissions from the coating and cleanup materials used in the source, during all days in which the source used a photochemically reactive material (tons OC/rolling 12 months);
 - c. the rolling 12-month summation of total OC emissions from the coating and cleanup materials used (tons OC/rolling 12 months);
 - d. the amount of coatings and the amount of cleanup materials used in the emissions unit (gallons/month); and
 - e. the rolling 12-month summation of the amount of coatings used (gallons/rolling 12 months).
3. At the end of each year the permittee shall collect and record the total amount of cleanup material used during the year, less any record of cleanup material sent off-site for recovery, recycle, and/or disposal (gallons/year).
4. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.
5. The permittee shall maintain daily records that document any time periods when the water curtain was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each day, during which the average hourly OC emissions from all coatings and cleanup materials used in the emissions unit exceeded 4.80 pounds per hour, and the actual average hourly OC emissions for each such day;
 - b. for the days during which a photochemically reactive material was employed, an identification of each day during which the OC emissions from all coatings and cleanup materials used in the emissions unit exceeded 40 pounds per day, and the actual OC emissions for each such day;
 - c. an identification of any monthly record showing an exceedance of the rolling 12-month coating usage limitation;
 - d. an identification of any monthly record showing an exceedance of the annual rolling emission limit, from coatings and cleanup materials, of 11.13 tons of OC per rolling 12 months; and
 - e. an identification of any monthly record showing an exceedance of the annual rolling emission limit, from coatings and cleanup materials when using photochemically reactive materials, of 7.3 tons of OC per rolling 12 months.
2. The permittee shall notify the Ohio EPA Central District Office in writing of any daily record showing that the water curtain 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 Central District Office within 30 days after the event occurs.

IV. Reporting Requirements (continued)

3. The permittee shall submit annual reports of the total organic compound emissions and the total gallons of cleanup materials used during the previous calendar year. This report shall be satisfied by including this information for this emissions unit in the submission of the annual Fee Emission Report.

V. Testing Requirements

1. Hourly and Daily Emission Limitation for Coating Application

4.80 lbs OC/hour and 40.0 lbs OC/day when using photochemically reactive materials

Applicable Compliance Method

Compliance with the hourly and daily OC limits shall be determined through daily recordkeeping as specified in Section A.III.1. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials. When a photochemically reactive coating or cleanup material is used, daily emissions shall be calculated by multiplying the OC content of each coating and cleanup material used (lbs OC/gallon of material) times each coating and cleanup material's usage each day, and then these emissions shall be summed for all the coatings and cleanup used.

- 2.a Annual Emission Limitation

7.30 tons OC/rolling 12-months when using photochemically reactive materials

Applicable Compliance Method

Compliance with this annual OC limit shall be determined through monthly recordkeeping as specified in Section A.III.2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials. Annual emissions shall be calculated by adding the monthly emissions, derived from daily emission calculations from coating and cleanup material use each month, when using a photochemically reactive material. Twelve-month rolling emissions from the use of photochemically reactive material shall be calculated by adding the current monthly emission calculations from the source to the previous 11 month's emission calculations.

- 2.b Annual Emission Limitation

11.13 tons OC/rolling 12 months

Applicable Compliance Method

Compliance with this annual OC limit shall be determined through monthly recordkeeping as specified in Section A.III.2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials. Annual emissions shall be calculated by adding the monthly emissions, derived from daily emission calculations from coating and cleanup material use each month. Twelve-month rolling emissions shall be calculated by adding the current monthly emission calculations from the source to the previous 11 month's emission calculations.

V. Testing Requirements (continued)

3. Annual Rolling Coating and Cleanup Material Usage limitations

2,750 gallons of coating/rolling 12-months

These limits on the coating usage may change as per the formula in Section A.1.2.a, as replacement coatings with lower OC content are approved as required in this permit.

Applicable Compliance Method

Compliance with the coating usage limits shall be determined through daily or monthly recordkeeping of each coating and cleanup material used in each source. Rolling 12-month coating usage in each source shall be calculated each month by adding each new month's usage to the previous rolling 11 months.

4.a Annual Cleanup Material Usage limitations

408 gallons of cleanup material/year

Applicable Compliance Method

Compliance with the cleanup usage limits shall be determined through daily and annual recordkeeping of each cleanup material used. Cleanup materials that are collected for off-site recycle, recovery, and/or disposal shall be subtracted from each monthly record of cleanup use.

4.b Hourly Cleanup Material Usage limitation

0.5 gallons of cleanup material in any single hour of time

Applicable Compliance Method

Compliance with the maximum cleanup material usage limit shall be determined through daily recordkeeping of the cleanup material used and the hours of operation.

5. Emission Limitation for Particulate Matter

0.035 lbs PM/hr
0.153 tons PM/yr

Applicable Compliance Method

Compliance with the hourly PM limit shall be determined through daily recordkeeping of coating usage, the PM content of each coating, and operating hours per day for the unit. Formulation data from the manufacturer's MSDS shall be used to determine the particulate content of the coatings. Hourly emissions shall be calculated by multiplying the maximum PM content of the coating used in the source (2 pounds PM/gallon of coating) times the coating's maximum usage in any hour (gallons/hour). If the source has run at the same rate all day, the maximum use in any hour can be calculated by dividing the total use at the end of that day by the hours the source ran during that day. Calculations shall be documented as follows:

PM emissions/hr.=(2.0 lbs PM/gal of coating) x (coating usage in gal/hr) x (1-TE) x (1-CE) or as per above:

PM emissions/hr.=(2.0 lbs PM/gal of coating) x (coating usage in gal/day) / (hours of operation) x (1-TE) x (1-CE) and

Annual PM emissions (tons/yr)= (2.0 lbs PM/gal of coating) x (coating usage in gal/year) x (1-TE) x (1-CE) / (2000 lbs/ton)

TE= transfer efficiency (65% for electrostatic application)

CE= capture efficiency (95% for water wash control)

V. Testing Requirements (continued)

6. Emission Limitation

Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

1. Toxics Policy Requirement

This permit allows the use of coatings and cleanup materials specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Toluene
TLV: 188 mg/m³:
Maximum Hourly Emission Rate: 3.88 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 1,166 ug/m³:
MAGLC: 4,476 ug/m³

Pollutant: Xylene
TLV: 434 mg/m³
Maximum Hourly Emission Rate: 1.31 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 394 ug/m³:
MAGLC: 10,333 ug/m³

Pollutant: n-Butyl Alcohol
TLV: 152 mg/m³
Maximum Hourly Emission Rate: 3.78 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 1,135 ug/m³:
MAGLC: 3,619 ug/m³

Pollutant: Methylcyclohexane
TLV: 1,610 mg/m³
Maximum Hourly Emission Rate: 9.07 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 2,726 ug/m³:
MAGLC: 38,333 ug/m³

Pollutant: Diacetone Alcohol
TLV: 238 mg/m³
Maximum Hourly Emission Rate: 1.44 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 432 ug/m³:
MAGLC: 5,666 ug/m³

Pollutant: Ethyl Acetate
TLV: 1,440 mg/m³
Maximum Hourly Emission Rate: 2.51 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 754 ug/m³:
MAGLC: 34,286 ug/m³

VI. Miscellaneous Requirements (continued)

Pollutant: Isopropyl Alcohol
TLV: 983 mg/m³
Maximum Hourly Emission Rate: 3.78 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 1,135 ug/m³:
MAGLC: 23,405 ug/m³

Pollutant: Methanol
TLV: 262 mg/m³
Maximum Hourly Emission Rate: 3.78 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 1,135 ug/m³:
MAGLC: 6,238 ug/m³

2. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":
 - 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 specified in the above table;
 - b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
 - c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
 - d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.
3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
 - a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
 - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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Primer Spray
Booth # 1

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: Spray Booth for Hardcoat #2 (R019)
Activity Description: Hardcoat Booth #2

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Hardcoat Spray Booth # 2	OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 40 pounds/day when using photochemically reactive materials; and The hourly emissions rate requirement is less stringent than the PTI limit
	OAC rule 3745-31-05 Synthetic Minor PTI #01-7415	Organic compound emissions shall not exceed 5.81 lbs/hour; Organic compound emissions shall not exceed 7.30 tons/rolling 12 months when using photochemically reactive materials; Organic compound emissions shall not exceed 11.69 tons/rolling 12 months; Coating usage shall not exceed 3,253 gallons/rolling 12 months, except as per Section A.I.2.a below; Cleanup usage shall not exceed 408 gallons/yr; Particulate emissions shall not exceed 0.035 lb/hr; and Particulate emissions shall not exceed 0.153 ton/yr less stringent than the PTI limit
	OAC rule 3745-17-11	

**Operations, Property,
and/or Equipment**

**Applicable Rules/
Requirements**

**Applicable Emissions
Limitations/Control
Measures**

OAC rule 3745-17-07

Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.

2. Additional Terms and Conditions

- 2.a** In order to retain the ability to replace coatings with those of less toxicity and/or with a lower organic compound (OC) content, a new coating, that passes the Air Toxics Policy as described in Section A.VI, and is approved by the Ohio EPA Central District Office, shall be limited in its use as per the following formulas:

Maximum coating use/hr (gal/hr) = (5.81 lbs OC/hr source limit) / (y lbs OC/gal)

Maximum coating use/yr (gal/yr) = [(11.69 tons OC/yr source limit - 0.16 tons/yr maximum cleanup emissions/yr) / (y lbs.OC/gal)] x (2000 lbs/ton)

y = OC content of new coatings by weight (lbs)

Until such a coating is submitted with an analysis for approval, the maximum annual coating usage for the hardcoat line, emissions unit R019, shall not exceed 3,253 gallons per rolling 12 months.

II. Operational Restrictions

1. The total cleanup material used in this emissions unit shall not exceed 0.5 gallon in any hour. This limit was established to demonstrate compliance with the Air Toxics Policy.
2. The permittee shall operate the water curtain whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the coating operation:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and each cleanup material employed;
 - c. the total number of gallons of all coatings and total number of gallons of all cleanup materials employed;
 - d. the organic compound content of each coating and cleanup material, in pounds per gallon;
 - e. if a credit to emissions from recovered cleanup materials is to be used in emission calculations, the number of gallons of cleanup material reclaimed for off-site recycle, recovery, and/or disposal from the emissions unit;
 - f. the total organic compound emission rate for all coatings and cleanup materials, in pounds per day for the emissions unit;
 - g. the documentation of whether or not a photochemically reactive material is used on that day;
 - h. the total number of hours the emissions unit was in operation; and
 - i. the average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (f)/(h), in pounds per hour (average).

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

2. The permittee shall collect and record the following information at the end of each month for the emissions unit:
 - a. the total OC emissions from all the coating and cleanup materials used in the emissions unit (lbs OC/month);
 - b. the rolling 12-month summation of OC emissions from the coating and cleanup materials used in the source, during all days in which the source used a photochemically reactive material (tons OC/rolling 12 months);
 - c. the rolling 12-month summation of total OC emissions from the coating and cleanup materials used (tons OC/rolling 12 months);
 - d. the amount of coatings and the amount of cleanup materials used in the emissions unit (gallons/month); and
 - e. the rolling 12-month summation of the amount of coatings used (gallons/rolling 12 months).
3. At the end of each year the permittee shall collect and record the total amount of cleanup material used during the year, less any record of cleanup material sent off-site for recovery, recycle, and/or disposal (gallons/year).
4. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.
5. The permittee shall maintain daily records that document any time periods when the water curtain was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each day, during which the average hourly OC emissions from all coatings and cleanup materials used in the emissions unit exceeded 5.81 pounds per hour, and the actual average hourly OC emissions for each such day;
 - b. for the days during which a photochemically reactive material was employed, an identification of each day during which the OC emissions from all coatings and cleanup materials used in the emissions unit exceeded 40 pounds per day, and the actual OC emissions for each such day;
 - c. an identification of any monthly record showing an exceedance of the rolling 12-month coating usage limitation;
 - d. an identification of any monthly record showing an exceedance of the annual rolling emission limit, from coatings and cleanup materials, of 11.69 tons of OC per rolling 12 months; and
 - e. an identification of any monthly record showing an exceedance of the annual rolling emission limit, from coatings and cleanup materials when using photochemically reactive materials, of 7.3 tons of OC per rolling 12 months.
2. The permittee shall notify the Ohio EPA Central District Office in writing of any daily record showing that the water curtain 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 Central District Office within 30 days after the event occurs.

IV. Reporting Requirements (continued)

3. The permittee shall submit annual reports of the total organic compound emissions and the total gallons of cleanup materials used during the previous calendar year. This report shall be satisfied by including this information for this emissions unit in the submission of the annual Fee Emission Report.

V. Testing Requirements

1. Hourly and Daily Emission Limitation for Coating Application

5.81 lbs OC/hour and 40.0 lbs OC/day when using photochemically reactive materials

Applicable Compliance Method

Compliance with the hourly and daily OC limits shall be determined through daily recordkeeping as specified in Section A.III.1. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials. When a photochemically reactive coating or cleanup material is used, daily emissions shall be calculated by multiplying the OC content of each coating and cleanup material used (lbs OC/gallon of material) times each coating and cleanup material's usage each day, and then these emissions shall be summed for all the coatings and cleanup used.

- 2.a Annual Emission Limitation

7.30 tons OC/rolling 12-months when using photochemically reactive materials

Applicable Compliance Method

Compliance with this annual OC limit shall be determined through monthly recordkeeping as specified in Section A.III.2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials. Annual emissions shall be calculated by adding the monthly emissions, derived from daily emission calculations from coating and cleanup material use each month, when using a photochemically reactive material. Twelve month rolling emissions from the use of photochemically reactive material shall be calculated by adding the current monthly emission calculations from the source to the previous 11 month's emission calculations.

- 2.b Annual Emission Limitation

11.69 tons OC/rolling 12-months

Applicable Compliance Method

Compliance with this annual OC limit shall be determined through monthly recordkeeping as specified in Section A.III.2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials. Annual emissions shall be calculated by adding the monthly emissions, derived from daily emission calculations from coating and cleanup material use each month. Twelve month rolling emissions shall be calculated by adding the current monthly emission calculations from the source to the previous 11 month's emission calculations.

3. Annual Rolling Coating and Cleanup Material Usage limitations

3,253 gallons of coating/rolling 12-months

These limits on the coating usage may change as per the formula in Section A.I.2.a, as replacement coatings with lower OC content are approved as required in this permit.

Applicable Compliance Method

Compliance with the coating usage limits shall be determined through daily or monthly recordkeeping of each coating and cleanup material used in each source. Rolling 12-month coating usage in each source shall be calculated each month by adding each new month's usage to the previous rolling 11-months.

V. Testing Requirements (continued)

4.a Annual Cleanup Material Usage limitations

408 gallons of cleanup material/year

Applicable Compliance Method

Compliance with the cleanup usage limits shall be determined through monthly recordkeeping of each cleanup material used. Cleanup materials that are collected for off-site recycle, recovery, and/or disposal shall be subtracted from each monthly record of cleanup use.

4.b Hourly Cleanup Material Usage limitation

0.5 gallons of cleanup material in any single hour of time

Applicable Compliance Method

Compliance with the maximum cleanup material usage limit shall be determined through daily recordkeeping of the cleanup material used and the hours of operation.

5. Emission Limitation for Particulate Matter

0.035 lbs PM/hr
0.153 tons PM/yr

Applicable Compliance Method

Compliance with the hourly PM limit shall be determined through daily recordkeeping of coating usage, the PM content of each coating, and operating hours per day for the unit. Formulation data from the manufacturer's MSDS shall be used to determine the particulate content of the coatings. Hourly emissions shall be calculated by multiplying the maximum PM content of the coating used in the source (2 pounds PM/gallon of coating) times the coating's maximum usage in any hour (gallons/hour). If the source has run at the same rate all day, the maximum use in any hour can be calculated by dividing the total use at the end of that day by the hours the source ran during that day. Calculations shall be documented as follows:

PM emissions/hr.=(2.0 lbs PM/gal of coating) x (coating usage in gal/hr) x (1-TE) x (1-CE) or as per above:

PM emissions/hr.=(2.0 lbs PM/gal of coating) x (coating usage in gal/day) / (hours of operation) x (1-TE) x (1-CE) and

Annual PM emissions (tons/yr)= (2.0 lbs PM/gal of coating) x (coating usage in gal/year) x (1-TE) x (1-CE) / (2000 lbs/ton)

TE= transfer efficiency (65% for electrostatic application)

CE= capture efficiency (95% for water wash control)

6. Emission Limitation

Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

1. Toxics Policy Requirement

This permit allows the use of coatings and cleanup materials specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Toluene
TLV: 188 mg/m³:
Maximum Hourly Emission Rate: 3.88 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 1,166 ug/m³:
MAGLC: 4,476 ug/m³

Pollutant: Xylene
TLV: 434 mg/m³
Maximum Hourly Emission Rate: 1.31 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 394 ug/m³:
MAGLC: 10,333 ug/m³

Pollutant: n-Butyl Alcohol
TLV: 152 mg/m³
Maximum Hourly Emission Rate: 3.78 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 1,135 ug/m³:
MAGLC: 3,619 ug/m³

Pollutant: Methylcyclohexane
TLV: 1,610 mg/m³
Maximum Hourly Emission Rate: 9.07 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 2,726 ug/m³:
MAGLC: 38,333 ug/m³

Pollutant: Diacetone Alcohol
TLV: 238 mg/m³
Maximum Hourly Emission Rate: 1.44 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 432 ug/m³:
MAGLC: 5,666 ug/m³

Pollutant: Ethyl Acetate
TLV: 1,440 mg/m³
Maximum Hourly Emission Rate: 2.51 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 754 ug/m³:
MAGLC: 34,286 ug/m³

VI. Miscellaneous Requirements (continued)

Pollutant: Isopropyl Alcohol
TLV: 983 mg/m³
Maximum Hourly Emission Rate: 3.78 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 1,135 ug/m³:
MAGLC: 23,405 ug/m³

Pollutant: Methanol
TLV: 262 mg/m³
Maximum Hourly Emission Rate: 3.78 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 1,135 ug/m³:
MAGLC: 6,238 ug/m³

2. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":
 - 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 specified in the above table;
 - b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
 - c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
 - d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.
3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
 - a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
 - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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Hardcoat Spray
Booth # 2

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: Spray Booth for Hardcoat #3 (R020)
Activity Description: Hardcoat Booth #3

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Hardcoat Spray Booth # 3	OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 40 pounds/day when using photochemically reactive materials; and The hourly emissions rate requirement is less stringent than the PTI limit
	OAC rule 3745-31-05 Synthetic Minor PTI #01-7415	Organic compound emissions shall not exceed 5.81 lbs/hour; Organic compound emissions shall not exceed 7.30 tons/rolling 12 months when using photochemically reactive materials; Organic compound emissions shall not exceed 11.69 tons/rolling 12 months; Coating usage shall not exceed 3,253 gallons/rolling 12 months, except as per Section A.I.2.a below; Cleanup usage shall not exceed 408 gallons/yr; Particulate emissions shall not exceed 0.035 lb/hr; and
	OAC rule 3745-17-11	Particulate emissions shall not exceed 0.153 ton/yr less stringent than PTI limit

**Operations, Property,
and/or Equipment**

**Applicable Rules/
Requirements**

**Applicable Emissions
Limitations/Control
Measures**

OAC rule 3745-17-07

Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.

2. Additional Terms and Conditions

- 2.a** In order to retain the ability to replace coatings with those of less toxicity and/or with a lower organic compound (OC) content, a new coating, that passes the Air Toxics Policy as described in Section A.VI, and is approved by the Ohio EPA Central District Office, shall be limited in its use as per the following formulas:

Maximum coating use/hr (gal/hr) = (5.81 lbs OC/hr source limit) / (y lbs OC/gal)

Maximum coating use/yr (gal/yr) = [(11.69 tons OC/yr source limit - 0.16 tons/yr maximum cleanup emissions/yr) / (y lbs.OC/gal)] x (2000 lbs/ton)

y = OC content of new coatings by weight (lbs)

Until such a coating is submitted with an analysis for approval, the maximum annual coating usage for the hardcoat line, emissions unit R020, shall not exceed 3,253 gallons per rolling 12 months.

II. Operational Restrictions

1. The total cleanup material used in this emissions unit shall not exceed 0.5 gallon in any hour. This limit was established to demonstrate compliance with the Air Toxics Policy.
2. The permittee shall operate the water curtain whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the coating operation:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and each cleanup material employed;
 - c. the total number of gallons of all coatings and total number of gallons of all cleanup materials employed;
 - d. the organic compound content of each coating and cleanup material, in pounds per gallon;
 - e. if a credit to emissions from recovered cleanup materials is to be used in emission calculations, the number of gallons of cleanup material reclaimed for off-site recycle, recovery, and/or disposal from the emissions unit;
 - f. the total organic compound emission rate for all coatings and cleanup materials, in pounds per day for the emissions unit;
 - g. the documentation of whether or not a photochemically reactive material is used on that day;
 - h. the total number of hours the emissions unit was in operation; and
 - i. the average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (f)/(h), in pounds per hour (average).

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

2. The permittee shall collect and record the following information at the end of each month for the emissions unit:
 - a. the total OC emissions from all the coating and cleanup materials used in the emissions unit (lbs OC/month);
 - b. the rolling 12-month summation of OC emissions from the coating and cleanup materials used in the source, during all days in which the source used a photochemically reactive material (tons OC/rolling 12 months);
 - c. the rolling 12-month summation of total OC emissions from the coating and cleanup materials used (tons OC/rolling 12 months);
 - d. the amount of coatings and the amount of cleanup materials used in the emissions unit (gallons/month); and
 - e. the rolling 12-month summation of the amount of coatings used (gallons/rolling 12 months).
3. At the end of each year the permittee shall collect and record the total amount of cleanup material used during the year, less any record of cleanup material sent off-site for recovery, recycle, and/or disposal (gallons/year).
4. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.
5. The permittee shall maintain daily records that document any time periods when the water curtain was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each day, during which the average hourly OC emissions from all coatings and cleanup materials used in the emissions unit exceeded 5.81 pounds per hour, and the actual average hourly OC emissions for each such day;
 - b. for the days during which a photochemically reactive material was employed, an identification of each day during which the OC emissions from all coatings and cleanup materials used in the emissions unit exceeded 40 pounds per day, and the actual OC emissions for each such day;
 - c. an identification of any monthly record showing an exceedance of the rolling 12-month coating usage limitation;
 - d. an identification of any monthly record showing an exceedance of the annual rolling emission limit, from coatings and cleanup materials, of 11.69 tons of OC per rolling 12 months; and
 - e. an identification of any monthly record showing an exceedance of the annual rolling emission limit, from coatings and cleanup materials when using photochemically reactive materials, of 7.3 tons of OC per rolling 12 months.
2. The permittee shall notify the Ohio EPA Central District Office in writing of any daily record showing that the water curtain 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 Central District Office within 30 days after the event occurs.

IV. Reporting Requirements (continued)

- 3.** The permittee shall submit annual reports of the total organic compound emissions and the total gallons of cleanup materials used during the previous calendar year. This report shall be satisfied by including this information for this emissions unit in the submission of the annual Fee Emission Report.

V. Testing Requirements

1.a Hourly and Daily Emission Limitation for Coating Application

8.0 lbs OC/hour and 40.0 lbs OC/day when using photochemically reactive materials

Applicable Compliance Method

Compliance with the hourly and daily OC limits shall be determined through daily recordkeeping as specified in Section A.III.1. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials. When a photochemically reactive coating or cleanup material is used, daily emissions shall be calculated by multiplying the OC content of each coating and cleanup material used (lbs OC/gallon of material) times each coating and cleanup material's usage each day, and then these emissions shall be summed for all the coatings and cleanup used.

1.b Hourly Emission Limitation for the Hardcoat Application

5.81 lbs OC/hr

Applicable Compliance Method

Compliance with the hourly OC limit shall be determined through daily recordkeeping as specified in Section A.III.1. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials. When a photochemically reactive coating or cleanup material is used, daily emissions shall be calculated by multiplying the maximum OC content of all materials used (lbs OC/gallon of material) times each coating and cleanup material's usage each day (these emissions shall be summed, for all coatings and cleanup used). Calculations shall be documented for as follows:

$D = \text{OC emissions/day} = (\text{lbs OC/gal coating}) \times (\text{coating usage in gal/day}) + (\text{lbs OC/gal cleanup}) \times (\text{cleanup material usage in gal/day} - \text{recovered cleanup for off-site disposal in gal/day})$

$\text{OC emissions/hr} = D / \text{hours of operation per day}$

2.a Annual Emission Limitation

7.30 tons OC/rolling 12-months when using photochemically reactive materials

Applicable Compliance Method

Compliance with this annual OC limit shall be determined through monthly recordkeeping as specified in Section A.III.2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials. Annual emissions shall be calculated by adding the monthly emissions, derived from daily emission calculations from coating and cleanup material use each month, when using a photochemically reactive material. Twelve-month rolling emissions from the use of photochemically reactive material shall be calculated by adding the current monthly emission calculations from the source to the previous 11 month's emission calculations.

V. Testing Requirements (continued)

2.b Annual Emission Limitation

11.69 tons OC/rolling 12-months

Applicable Compliance Method

Compliance with this annual OC limit shall be determined through monthly recordkeeping as specified in Section A.III.2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials. Annual emissions shall be calculated by adding the monthly emissions, derived from daily emission calculations from coating and cleanup material use each month. Twelve-month rolling emissions shall be calculated by adding the current monthly emission calculations from the source to the previous 11 month's emission calculations.

3. Annual Rolling Coating and Cleanup Material Usage limitations

3,253 gallons of coating/rolling 12-months

These limits on the coating usage may change as per the formula in Section A.I.2.a, as replacement coatings with lower OC content are approved as required in this permit.

Applicable Compliance Method

Compliance with the coating usage limits shall be determined through daily or monthly recordkeeping of each coating and cleanup material used in each source. Rolling 12-month coating usage in each source shall be calculated each month by adding each new month's usage to the previous rolling 11 months.

4.a Annual Cleanup Material Usage limitations

408 gallons of cleanup material/year

Applicable Compliance Method

Compliance with the cleanup usage limits shall be determined through daily and annual recordkeeping of each cleanup material used. Cleanup materials that are collected for off-site recycle, recovery, and/or disposal shall be subtracted from each monthly record of cleanup use.

4.b Hourly Cleanup Material Usage limitation

0.5 gallons of cleanup material in any single hour of time

Applicable Compliance Method

Compliance with the maximum cleanup material usage limit shall be determined through daily recordkeeping of the cleanup material used and the hours of operation.

V. Testing Requirements (continued)

5. Emission Limitation for Particulate Matter

0.035 lbs PM/hr
0.153 tons PM/yr

Applicable Compliance Method

Compliance with the hourly PM limit shall be determined through daily recordkeeping of coating usage, the PM content of each coating, and operating hours per day for the unit. Formulation data from the manufacturer's MSDS shall be used to determine the particulate content of the coatings. Hourly emissions shall be calculated by multiplying the maximum PM content of the coating used in the source (2 pounds PM/gallon of coating) times the coating's maximum usage in any hour (gallons/hour). If the source has run at the same rate all day, the maximum use in any hour can be calculated by dividing the total use at the end of that day by the hours the source ran during that day. Calculations shall be documented as follows:

PM emissions/hr.=(2.0 lbs PM/gal of coating) x (coating usage in gal/hr) x (1-TE) x (1-CE) or as per above:

PM emissions/hr.=(2.0 lbs PM/gal of coating) x (coating usage in gal/day) / (hours of operation) x (1-TE) x (1-CE) and

Annual PM emissions (tons/yr)= (2.0 lbs PM/gal of coating) x (coating usage in gal/year) x (1-TE) x (1-CE) / (2000 lbs/ton)

TE= transfer efficiency (65% for electrostatic application)

CE= capture efficiency (95% for water wash control)

6. Emission Limitation

Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

1. Toxics Policy Requirement

This permit allows the use of coatings and cleanup materials specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Toluene
TLV: 188 mg/m³:
Maximum Hourly Emission Rate: 3.88 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 1,166 ug/m³:
MAGLC: 4,476 ug/m³

Pollutant: Xylene
TLV: 434 mg/m³
Maximum Hourly Emission Rate: 1.31 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 394 ug/m³:
MAGLC: 10,333 ug/m³

Pollutant: n-Butyl Alcohol
TLV: 152 mg/m³
Maximum Hourly Emission Rate: 3.78 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 1,135 ug/m³:
MAGLC: 3,619 ug/m³

Pollutant: Methylcyclohexane
TLV: 1,610 mg/m³
Maximum Hourly Emission Rate: 9.07 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 2,726 ug/m³:
MAGLC: 38,333 ug/m³

Pollutant: Diacetone Alcohol
TLV: 238 mg/m³
Maximum Hourly Emission Rate: 1.44 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 432 ug/m³:
MAGLC: 5,666 ug/m³

Pollutant: Ethyl Acetate
TLV: 1,440 mg/m³
Maximum Hourly Emission Rate: 2.51 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 754 ug/m³:
MAGLC: 34,286 ug/m³

VI. Miscellaneous Requirements (continued)

Pollutant: Isopropyl Alcohol
TLV: 983 mg/m³
Maximum Hourly Emission Rate: 3.78 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 1,135 ug/m³:
MAGLC: 23,405 ug/m³

Pollutant: Methanol
TLV: 262 mg/m³
Maximum Hourly Emission Rate: 3.78 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 1,135 ug/m³:
MAGLC: 6,238 ug/m³

2. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":
 - 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 specified in the above table;
 - b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
 - c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
 - d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.
3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
 - a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
 - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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Hardcoat Spray
Booth # 3

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: Spray Booth for Primer #4 (R021)
Activity Description: Priming Booth #4

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Primer Spray Booth # 4	OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 40 pounds/day when using photochemically reactive materials; and The hourly emissions rate requirement is less stringent than the PTI limit
	OAC rule 3745-31-05 Synthetic Minor PTI #01-7415	Organic compound emissions shall not exceed 4.80 lbs/hour; Organic compound emissions shall not exceed 7.30 tons/rolling 12 months when using photochemically reactive materials; Organic compound emissions shall not exceed 11.13 tons/rolling 12 months; Coating usage shall not exceed 2,750 gallons/rolling 12 months, except as per Section A.I.2.a below; Cleanup usage shall not exceed 408 gallons/yr; Particulate emissions shall not exceed 0.035 lb/hr; and Particulate emissions shall not exceed 0.153 ton/yr less stringent than the PTI limit
	OAC rule 3745-17-11	

**Operations, Property,
and/or Equipment**

**Applicable Rules/
Requirements**

**Applicable Emissions
Limitations/Control
Measures**

OAC rule 3745-17-07

Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.

2. Additional Terms and Conditions

- 2.a** In order to retain the ability to replace coatings with those of less toxicity and/or with a lower organic compound (OC) content, a new coating, that passes the Air Toxics Policy as described in Section A.VI, and is approved by the Ohio EPA Central District Office, shall be limited in its use as per the following formulas:

Maximum coating use/hr (gal/hr) = (4.80 lbs OC/hr source limit) / (y lbs OC/gal)

Maximum coating use/yr (gal/yr) = [(11.13 tons OC/yr source limit - 0.13 tons/yr maximum cleanup emissions/yr)] / (y lbs.OC/gal) x (2000 lbs/ton)

y = OC content of new coatings by weight (lbs)

Until such a coating is submitted with an analysis for approval, the maximum annual coating usage for the primer line, emissions unit R021, shall not exceed 2,750 gallons per rolling 12 months.

II. Operational Restrictions

1. The total cleanup material used in this emissions unit shall not exceed 0.5 gallon in any hour. This limit was established to demonstrate compliance with the Air Toxics Policy.
2. The permittee shall operate the water curtain whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the coating operation:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and each cleanup material employed;
 - c. the total number of gallons of all coatings and total number of gallons of all cleanup materials employed;
 - d. the organic compound content of each coating and cleanup material, in pounds per gallon;
 - e. if a credit to emissions from recovered cleanup materials is to be used in emission calculations, the number of gallons of cleanup material reclaimed for off-site recycle, recovery, and/or disposal from the emissions unit;
 - f. the total organic compound emission rate for all coatings and cleanup materials, in pounds per day for the emissions unit;
 - g. the documentation of whether or not a photochemically reactive material is used on that day;
 - h. the total number of hours the emissions unit was in operation; and
 - i. the average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (f)/(h), in pounds per hour (average).

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

2. The permittee shall collect and record the following information at the end of each month for the emissions unit:
 - a. the total OC emissions from all the coating and cleanup materials used in the emissions unit (lbs OC/month);
 - b. the rolling 12-month summation of OC emissions from the coating and cleanup materials used in the source, during all days in which the source used a photochemically reactive material (tons OC/rolling 12 months);
 - c. the rolling 12-month summation of total OC emissions from the coating and cleanup materials used (tons OC/rolling 12 months);
 - d. the amount of coatings and the amount of cleanup materials used in the emissions unit (gallons/month); and
 - e. the rolling 12-month summation of the amount of coatings used (gallons/rolling 12 months).
3. At the end of each year the permittee shall collect and record the total amount of cleanup material used during the year, less any record of cleanup material sent off-site for recovery, recycle, and/or disposal (gallons/year).
4. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.
5. The permittee shall maintain daily records that document any time periods when the water curtain was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of each day, during which the average hourly OC emissions from all coatings and cleanup materials used in the emissions unit exceeded 4.80 pounds per hour, and the actual average hourly OC emissions for each such day;
 - b. for the days during which a photochemically reactive material was employed, an identification of each day during which the OC emissions from all coatings and cleanup materials used in the emissions unit exceeded 40 pounds per day, and the actual OC emissions for each such day;
 - c. an identification of any monthly record showing an exceedance of the rolling 12-month coating usage limitation;
 - d. an identification of any monthly record showing an exceedance of the annual rolling emission limit, from coatings and cleanup materials, of 11.13 tons of OC per rolling 12 months; and
 - e. an identification of any monthly record showing an exceedance of the annual rolling emission limit, from coatings and cleanup materials when using photochemically reactive materials, of 7.3 tons of OC per rolling 12 months.
2. The permittee shall notify the Ohio EPA Central District Office in writing of any daily record showing that the water curtain 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 Central District Office within 30 days after the event occurs.

IV. Reporting Requirements (continued)

3. The permittee shall submit annual reports of the total organic compound emissions and the total gallons of cleanup materials used during the previous calendar year. This report shall be satisfied by including this information for this emissions unit in the submission of the annual Fee Emission Report.

V. Testing Requirements

1. Hourly and Daily Emission Limitation for Coating Application

4.80 lbs OC/hour and 40.0 lbs OC/day when using photochemically reactive materials

Applicable Compliance Method

Compliance with the hourly and daily OC limits shall be determined through daily recordkeeping as specified in Section A.III.1. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials. When a photochemically reactive coating or cleanup material is used, daily emissions shall be calculated by multiplying the OC content of each coating and cleanup material used (lbs OC/gallon of material) times each coating and cleanup material's usage each day, and then these emissions shall be summed for all the coatings and cleanup used.

- 2.a Annual Emission Limitation

7.30 tons OC/rolling 12-months when using photochemically reactive materials

Applicable Compliance Method

Compliance with this annual OC limit shall be determined through monthly recordkeeping as specified in Section A.III.2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials. Annual emissions shall be calculated by adding the monthly emissions, derived from daily emission calculations from coating and cleanup material use each month, when using a photochemically reactive material. Twelve-month rolling emissions from the use of photochemically reactive material shall be calculated by adding the current monthly emission calculations from the source to the previous 11 month's emission calculations.

- 2.b Annual Emission Limitation

11.13 tons OC/rolling 12-months

Applicable Compliance Method

Compliance with this annual OC limit shall be determined through monthly recordkeeping as specified in Section A.III.2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials. Annual emissions shall be calculated by adding the monthly emissions, derived from daily emission calculations from coating and cleanup material use each month. Twelve month rolling emissions shall be calculated by adding the current monthly emission calculations from the source to the previous 11 month's emission calculations.

3. Annual Rolling Coating and Cleanup Material Usage limitations

2,750 gallons of coating/rolling 12-months

These limits on the coating usage may change as per the formula in Section A.I.2.a, as replacement coatings with lower OC content are approved as required in this permit.

Applicable Compliance Method

Compliance with the coating usage limits shall be determined through daily or monthly recordkeeping of each coating and cleanup material used in each source. Rolling 12-month coating usage in each source shall be calculated each month by adding each new month's usage to the previous rolling 11 months.

V. Testing Requirements (continued)

4.a Annual Cleanup Material Usage limitations

408 gallons of cleanup material/year

Applicable Compliance Method

Compliance with the cleanup usage limits shall be determined through daily and annual recordkeeping of each cleanup material used. Cleanup materials that are collected for off-site recycle, recovery, and/or disposal shall be subtracted from each monthly record of cleanup use.

4.b Hourly Cleanup Material Usage limitation

0.5 gallons of cleanup material in any single hour of time

Applicable Compliance Method

Compliance with the maximum cleanup material usage limit shall be determined through daily recordkeeping of the cleanup material used and the hours of operation.

5. Emission Limitation for Particulate Matter

0.035 lbs PM/hr
0.153 tons PM/yr

Applicable Compliance Method

Compliance with the hourly PM limit shall be determined through daily recordkeeping of coating usage, the PM content of each coating, and operating hours per day for the unit. Formulation data from the manufacturer's MSDS shall be used to determine the particulate content of the coatings. Hourly emissions shall be calculated by multiplying the maximum PM content of the coating used in the source (2 pounds PM/gallon of coating) times the coating's maximum usage in any hour (gallons/hour). If the source has run at the same rate all day, the maximum use in any hour can be calculated by dividing the total use at the end of that day by the hours the source ran during that day. Calculations shall be documented as follows:

PM emissions/hr.=(2.0 lbs PM/gal of coating) x (coating usage in gal/hr) x (1-TE) x (1-CE) or as per above:

PM emissions/hr.=(2.0 lbs PM/gal of coating) x (coating usage in gal/day) / (hours of operation) x (1-TE) x (1-CE) and

Annual PM emissions (tons/yr)= (2.0 lbs PM/gal of coating) x (coating usage in gal/year) x (1-TE) x (1-CE) / (2000 lbs/ton)

TE= transfer efficiency (65% for electrostatic application)

CE= capture efficiency (95% for water wash control)

6. Emission Limitation

Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method

Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

1. Toxics Policy Requirement

This permit allows the use of coatings and cleanup materials specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Toluene
TLV: 188 mg/m³:
Maximum Hourly Emission Rate: 3.88 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 1,166 ug/m³:
MAGLC: 4,476 ug/m³

Pollutant: Xylene
TLV: 434 mg/m³
Maximum Hourly Emission Rate: 1.31 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 394 ug/m³:
MAGLC: 10,333 ug/m³

Pollutant: n-Butyl Alcohol
TLV: 152 mg/m³
Maximum Hourly Emission Rate: 3.78 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 1,135 ug/m³:
MAGLC: 3,619 ug/m³

Pollutant: Methylcyclohexane
TLV: 1,610 mg/m³
Maximum Hourly Emission Rate: 9.07 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 2,726 ug/m³:
MAGLC: 38,333 ug/m³

Pollutant: Diacetone Alcohol
TLV: 238 mg/m³
Maximum Hourly Emission Rate: 1.44 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 432 ug/m³:
MAGLC: 5,666 ug/m³

Pollutant: Ethyl Acetate
TLV: 1,440 mg/m³
Maximum Hourly Emission Rate: 2.51 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 754 ug/m³:
MAGLC: 34,286 ug/m³

VI. Miscellaneous Requirements (continued)

Pollutant: Isopropyl Alcohol
TLV: 983 mg/m³
Maximum Hourly Emission Rate: 3.78 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 1,135 ug/m³:
MAGLC: 23,405 ug/m³

Pollutant: Methanol
TLV: 262 mg/m³
Maximum Hourly Emission Rate: 3.78 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 1,135 ug/m³:
MAGLC: 6,238 ug/m³

2. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":
 - 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 specified in the above table;
 - b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
 - c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
 - d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.
3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
 - a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
 - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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Primer Spray
Booth # 4

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: UV Line A (R022)
Activity Description: UV Line A

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
UV Line A with drying oven	OAC rule 3745-21-07(G)(2)	less stringent than the PTI limits

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-31-05 Synthetic Minor PTI #01-7415	Organic compound emissions shall not exceed 2.40 lbs/hr; Organic compound emissions shall not exceed 7.60 tons/rolling 12 months; 100% capture efficiency (total enclosure requirements) and 95% destruction efficiency (thermal incinerator) of OC emissions; Coating usage shall not exceed 59,904 gallons/rolling 12 months, except as per Section A.I.2.a; and Cleanup usage shall not exceed 660 gallons/yr; Particulate emissions shall not exceed 0.28 lb/hr; Particulate emissions shall not exceed 1.23 tons/yr; and Emissions from natural gas usage in the incinerator and drying ovens from R022 & R023 together shall not exceed: 0.690 lb NOx/hr; 2.582 tons NOx/yr; 0.004 lb SO2/hr; 0.014 ton SO2/yr; 0.139 lb CO/hr; 0.522 ton CO/yr; 0.079 lb PM/hr; 0.295 ton PM/yr; 0.037 lb OC/yr; and 0.137 ton OC/yr
	OAC rule 3745-17-11	the requirements of PTI #01-7415 are more stringent than the rule
	OAC rule 3745-17-07	Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.

2. Additional Terms and Conditions

- 2.a** In order to retain the ability to replace coatings with those of less toxicity and/or with a lower organic compound (OC) content, a new coating, that passes the Air Toxic Policy as described in Section A.VI, and is approved by the Ohio EPA Central District Office, shall be limited in its use as per the following formulas:

$$\text{Maximum coating use/hr (gal/hr)} = (2.40 \text{ lbs OC/hr source limit}) / (y \text{ lbs OC/gal})$$

$$\text{Maximum coating use/yr (gal/yr)} = [(7.60 \text{ tons OC/yr source limit} - 0.22 \text{ tons/yr maximum cleanup emissions}) / (y \text{ lbs OC/gal})] \times (2000 \text{ lbs/ton})$$

$$y = \text{OC content of new coatings by weight (lbs)}$$

Until such a coating is submitted with an analysis for approval, the maximum annual coating usage for the UV coating line, emissions unit R022, shall not exceed 59,904 gallons per rolling 12 months.

- 2.b** The permittee shall control the emissions from emissions unit R022 through the use of a permanent total enclosure and a thermal incinerator with a minimum destruction and removal efficiency of 95%.

II. Operational Restrictions

1. The total cleanup material used in this source shall not exceed 0.5 gallon in any hour. This limit was established to demonstrate compliance with the Ohio air toxics policy.
2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inches of water, as averaged on an hourly basis, whenever the emission unit is in operation.
3. The permittee shall operate the water curtain whenever this emissions unit is in operation.
4. The minimum combustion temperature of the incinerator shall be maintained at 1,400 degrees Fahrenheit or higher until initial emissions testing has been completed. Thereafter, the average temperature of the exhaust gases from the thermal incinerator, for any 3-hour block of time, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emission units were in compliance.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the coating operation:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and each cleanup material employed;
 - c. the total gallons of all coatings and total gallons of all cleanup materials employed;
 - d. the organic compound content of each coating and cleanup material, in pounds per gallon;
 - e. if a credit to emissions from recovered cleanup materials is to be used in emission calculations, the number of gallons of cleanup material reclaimed for off-site recycle, recovery, and/or disposal from the emissions unit;
 - f. the total organic compound emission rate for all coatings and cleanup materials, in pounds per day for the emissions unit (emissions shall be calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance or 95%, until such time testing has been conducted);
 - g. the total organic compound emission rate for all coatings and cleanup materials when using a photochemically reactive material, in pounds per day for the emissions unit;
 - h. the total number of hours the emissions unit was in operation; and
 - i. the average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (f)/(h), in pounds per hour (average).

2. The permittee shall collect and record the following information at the end of each month for the emissions unit:
 - a. the total OC emissions from all the coating and cleanup materials used in the emissions unit (lbs OC/month);
 - b. the rolling 12-month summation of total OC emissions from all the coating and cleanup materials used in the emissions unit (tons OC/rolling 12 months);
 - c. the total coating and the total cleanup material used in the emissions unit (gallons/month); and
 - d. the rolling 12-month summation of the amount of coatings used (gallons/rolling 12 months).

3. At the end of each year the permittee shall collect and record the total amount of cleanup material used during the year, less any record of cleanup material sent off-site for recovery, recycle, and/or disposal (gallons/year).

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

4. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator 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 for the control equipment:

a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance or less than 1,400 degrees Fahrenheit until initial emissions testing has been completed.

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

5. The permittee shall install, maintain, and operate monitoring devices and a recorder which continuously and simultaneously measure and record the pressure inside and outside the permanent total enclosure surrounding R022. The monitoring and recording devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

The permittee shall continuously record the pressure differential between the inside and outside of the permanent total enclosure, when the emissions unit is in operation.

6. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:

a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and

b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

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

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. any record of a pressure differential deviation (excursion) report that identifies all periods of time during which the permanent total enclosure was not maintained at the required differential pressure of 0.007 inches of water, when the emissions unit was in operation;
 - b. an identification of each day, during which the average hourly OC emissions from all coatings and cleanup materials used in the source exceeded 2.40 pounds per hour, and the actual average hourly OC emissions for each such day;
 - c. an identification of any exceedances of the hourly and annual cleanup usage limitation and the rolling 12-month coating usage limitation;
 - d. an identification of any monthly record showing an exceedance of the 12-month rolling emission limit of 7.60 tons, from coating and cleanup materials;
 - e. an identification of all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent performance test that demonstrated the emissions unit was in compliance, or below 1,400 degrees Fahrenheit until initial emissions testing has been completed; and
 - f. any record of downtime for the capture (collection) system, control device, and monitoring equipment, when the emissions unit was in operation.
2. The permittee shall notify the Ohio EPA Central District Office in writing of any daily record showing that the water curtain 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 Central District Office within 30 days after the event occurs.
3. The permittee shall submit annual reports of the total organic compound emissions and the total gallons of cleanup materials used during the previous calendar year. This report shall be satisfied by including this information for this emissions unit in the submission of the annual Fee Emission Report.

V. Testing Requirements

1. Hourly Emission Limitation for UV Coating Line A

2.4 pounds OC/hour

Applicable Compliance Method

Compliance with the hourly and daily OC limits shall be determined through daily recordkeeping as specified in Section A.III.1. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials. When a photochemically reactive coating or cleanup material is used, daily emissions shall be calculated by multiplying the OC content of each coating and cleanup material used (lbs OC/gallon of material) times each coating and cleanup material's usage each day, and then these emissions shall be summed for all the coatings and cleanup used.

V. Testing Requirements (continued)

2. Annual Emission Limitation

7.60 tons OC/rolling 12-months

Applicable Compliance Method

Compliance with this annual OC limit shall be determined through monthly recordkeeping as specified in Section A.III.2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials. Annual emissions shall be calculated by adding the monthly emissions, derived from daily emission calculations from coating and cleanup material use each month. Twelve month rolling emissions shall be calculated by adding the current monthly emission calculations from the source to the previous 11 month's emission calculations.

Emissions shall be calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance or 95%, until such time testing has been conducted. Therefore, the above emission calculation shall use 95% control until testing adjusts this factor.

3. Annual Rolling Coating and Cleanup Material Usage limitations

59,904 gallons of coating/rolling 12-months

The limit on the coating usage may change as per the formula in Section A.I.2.a as replacement coatings with lower OC content are approved as required in this permit.

Applicable Compliance Method

Compliance with the coating usage limit shall be determined through monthly recordkeeping of total coating and cleanup material used in this source. Rolling 12-month coating usage in this source shall be calculated each month by adding each new month's usage to the previous rolling 11-months.

4.a Annual Cleanup Material Usage limitations

660 gallons of cleanup material/year

Applicable Compliance Method

Compliance with the cleanup usage limit shall be determined through monthly recordkeeping of each cleanup material used. Cleanup materials from this source that are collected for off-site recycle, recovery, and/or disposal shall be subtracted from each monthly record of cleanup use.

4.b Hourly Cleanup Material Usage limitation

0.5 gallons of cleanup material in any single hour of time

Applicable Compliance Method

Compliance with the maximum cleanup material usage limit shall be determined through daily recordkeeping of the cleanup material used and the hours of operation.

V. Testing Requirements (continued)

5. Emission Limitation for Particulate Matter

0.28 pounds PM/hour
1.23 tons PM/year

Applicable Compliance Method

Compliance with the hourly PM limits shall be determined through daily recordkeeping of coating usage, the PM content of each coating, and operating hours per day for the source. Formulation data from the manufacturer's MSDS shall be used to determine the particulate content of the coatings. Hourly emissions shall be calculated by multiplying the maximum PM content of the coating used in the source (2 lbs. PM/gallon of coating) times the coating's maximum usage in any hour (gallons/hr.). If the source has run at the same rate all day, the maximum use in any hour can be calculated by dividing the total use at the end of that day by the hours the source ran during that day. Calculations shall be documented as follows:

PM emissions/hr = (2.0 lbs PM/gal of coating) x (coating usage in gal/hr) x (1-TE) x (1-CE) or as per above:

PM emissions/hr = (2.0 lbs PM/gal of coating) x (coating usage in gal/day) / (hours of operation/day) x (1-TE) x (1-CE) and

Annual PM emissions (tons/yr) = (2.0 lbs PM/gal of coating) x (coating usage in gal/year) x (1-TE) x (1-CE) / (2000 lbs/ton)

TE= transfer efficiency (65% for electrostatic application)

CE= capture efficiency (95% for water wash control)

6.a Emission limitation from natural gas drying ovens and incinerator (from R022 & R023 together)

0.690 lb NOx/hr
2.582 tons NOx/yr
0.004 lb SO2/hr
0.014 tons SO2/yr
0.139 lb CO/hr
0.522 tons CO/yr
0.079 lb PM/hr
0.295 tons PM/yr
0.037 lb OC/yr
0.137 tons OC/yr

Applicable Compliance Method

Compliance with these limits shall be determined through daily recordkeeping of the number of hours of operation for sources R022 and R023 and their control device, the incinerator. These limits represent the maximum hourly natural gas usage of the incinerator and drying ovens. These emission limitations were determined by multiplying the natural gas usage (MM ft3) by the AP-42 and/or AIRS emission factor of each pollutant (lbs./MM ft3).

V. Testing Requirements (continued)

6.b Emissions of NO_x from natural gas use shall be calculated as follows:

Hourly NO_x emissions from incinerator = 100 lbs NO_x/106ft³ (emission factor) x 6000 ft³/hr (max. capacity of incinerator) plus

Hourly NO_x emissions from drying oven = 140 lbs NO_x/106ft³ (emission factor) x 320 ft³/hr (max. capacity of drying oven) x 2 (sources)

Annual NO_x emissions from incinerator = 100 lbs NO_x/106ft³ (emission factor) x 6000 ft³/hr (max. capacity of incinerator) x hrs of operation/yr / (2000 lbs/ton) plus

Annual NO_x emissions from drying oven = 140 lbs NO_x/106ft³ (emission factor) x 320 ft³/hr (max. capacity of drying oven) x hrs of operation/yr / (2000 lbs/ton) x 2 (sources)

6.c Emissions of SO₂ from natural gas use shall be calculated as follows:

Hourly SO₂ emissions from incinerator = 0.6 lbs SO₂/106ft³ (emission factor) x 6000 ft³/hr (max. capacity of incinerator) plus

Hourly SO₂ emissions from drying oven = 0.6 lbs SO₂/106ft³ (emission factor) x 320 ft³/hr (max. capacity of drying oven) x 2 (sources)

Annual SO₂ emissions from incinerator = 0.6 lbs SO₂/106ft³ (emission factor) x 6000 ft³/hr (max. capacity of incinerator) x hrs of operation/yr / (2000 lbs/ton) plus

Annual SO₂ emissions from drying oven = 0.6 lbs SO₂/106ft³ (emission factor) x 320 ft³/hr (max. capacity of drying oven) x hrs of operation/yr / (2000 lbs/ton) x 2 (sources)

6.d Emissions of CO from natural gas use shall be calculated as follows:

Hourly CO emissions from incinerator = 21 lbs CO/106ft³ (emission factor) x 6000 ft³/hr (max. capacity of incinerator) plus

Hourly CO emissions from drying oven = 21 lbs CO/106ft³ (emission factor) x 320 ft³/hr (max. capacity of drying oven) x 2 (sources)

Annual CO emissions from incinerator = 21 lbs CO/106ft³ (emission factor) x 6000 ft³/hr (max. capacity of incinerator) x hrs of operation/yr / (2000 lbs/ton) plus

Annual CO emissions from drying oven = 21 lbs CO/106ft³ (emission factor) x 320 ft³/hr (max. capacity of drying oven) x hrs of operation/yr / (2000 lbs/ton) x 2 (sources)

6.e Emissions of PM from natural gas use shall be calculated as follows:

Hourly PM emissions from incinerator = 11.9 lbs PM/106ft³ (emission factor) x 6000 ft³/hr (max. capacity of incinerator) plus

Hourly PM emissions from drying oven = 11.9 lbs PM/106ft³ (emission factor) x 320 ft³/hr (max. capacity of drying oven) x 2 (sources)

Annual PM emissions from incinerator = 11.9 lbs PM/106ft³ (emission factor) x 6000 ft³/hr (max. capacity of incinerator) x hrs of operation/yr / (2000 lbs/ton) plus

Annual PM emissions from drying oven = 11.9 lbs PM/106ft³ (emission factor) x 320 ft³/hr (max. capacity of drying oven) x hrs of operation/yr x / (2000 lbs/ton) x 2 (sources)

V. Testing Requirements (continued)

6.f Emissions of OC from natural gas use shall be calculated as follows:

Hourly OC emissions from incinerator = 5.8 lbs OC/106ft³ (emission factor) x 6000 ft³/hr (max. capacity of incinerator) plus

Hourly OC emissions from drying oven = 2.8 lbs OC/106ft³ (emission factor) x 320 ft³/hr (max. capacity of drying oven) x 2 (sources)

Annual OC emissions from incinerator = 5.8 lbs OC/106ft³ (emission factor) x 6000 ft³/hr (max. capacity of incinerator) x hrs of operation/yr / (2000 lbs/ton) plus

Annual OC emissions from drying oven = 2.8 lbs OC/106ft³ (emission factor) x 320 ft³/hr (max. capacity of drying oven) x hrs of operation/yr / (2000 lbs/ton) x 2 (sources)

6.g Since these limits represent the maximum hourly capacity of the equipment, no additional compliance determination is required beyond the daily recordkeeping of hours of operation.

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

i The emission testing shall be conducted within 6 months after issuance of the permit and within 3 months prior to permit renewal (the initial monitoring requirements may be satisfied if testing is conducted before the issuance of the Title V permit);

ii The emission testing shall be conducted to demonstrate compliance with the allowable hourly mass emission rate for organic compounds (2.4 pounds of OC/hour);

iii 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 Ohio EPA Central District Office;

iv Methods 1 through 4, 25 or 25A found in 40 CFR Part 60, Appendix A shall be employed to demonstrate compliance with the hourly allowable mass emission rate of organic compounds;

v The overall control efficiency of the incinerator for emissions unit R022 shall be demonstrated based upon the results of the capture efficiency (permanent total enclosure) and control efficiency tests. The capture efficiency or verification of permanent total enclosure 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 E.1.b. above and OAC rule 3745-21-10 or an approved alternative test protocol. 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.

V. Testing Requirements (continued)

- 7.b** Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emission units 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 Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Central District Office 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 Ohio EPA Central District Office 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 Ohio EPA Central District Office.

VI. Miscellaneous Requirements

1. Toxics Policy Requirement

This permit allows the use of coatings and cleanup materials specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Toluene
TLV: 188 mg/m³:
Maximum Hourly Emission Rate: 3.88 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 1,166 ug/m³:
MAGLC: 4,476 ug/m³

Pollutant: Xylene
TLV: 434 mg/m³
Maximum Hourly Emission Rate: 1.31 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 394 ug/m³:
MAGLC: 10,333 ug/m³

Pollutant: n-Butyl Alcohol
TLV: 152 mg/m³
Maximum Hourly Emission Rate: 3.78 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 1,135 ug/m³:
MAGLC: 3,619 ug/m³

Pollutant: Methylcyclohexane
TLV: 1,610 mg/m³
Maximum Hourly Emission Rate: 9.07 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 2,726 ug/m³:
MAGLC: 38,333 ug/m³

Pollutant: Diacetone Alcohol
TLV: 238 mg/m³
Maximum Hourly Emission Rate: 1.44 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 432 ug/m³:
MAGLC: 5,666 ug/m³

Pollutant: Ethyl Acetate
TLV: 1,440 mg/m³
Maximum Hourly Emission Rate: 2.51 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 754 ug/m³:
MAGLC: 34,286 ug/m³

VI. Miscellaneous Requirements (continued)

Pollutant: Isopropyl Alcohol
TLV: 983 mg/m³
Maximum Hourly Emission Rate: 3.78 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 1,135 ug/m³:
MAGLC: 23,405 ug/m³

Pollutant: Methanol
TLV: 262 mg/m³
Maximum Hourly Emission Rate: 3.78 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 1,135 ug/m³:
MAGLC: 6,238 ug/m³

2. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":
 - 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 specified in the above table;
 - b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
 - c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
 - d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.
3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
 - a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
 - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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**

UV Line A with drying oven

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: UV Line B (R023)
Activity Description: UV Line B

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
UV Line B with drying oven	OAC rule 3745-21-07(G)(2)	less stringent than the PTI limits

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-31-05 Synthetic Minor PTI #01-7415	Organic compound emissions shall not exceed 2.40 lbs/hr; Organic compound emissions shall not exceed 7.60 tons/rolling 12 months; 100% capture efficiency (total enclosure requirements) and 95% destruction efficiency (thermal incinerator) of OC emissions; Coating usage shall not exceed 59,904 gallons/rolling 12 months, except as per Section A.I.2.a; and Cleanup usage shall not exceed 660 gallons/yr; Particulate emissions shall not exceed 0.28 lb/hr; Particulate emissions shall not exceed 1.23 tons/yr; and Emissions from natural gas usage in the incinerator and drying ovens from R022 & R023 together shall not exceed: 0.690 lb NOx/hr; 2.582 tons NOx/yr; 0.004 lb SO2/hr; 0.014 ton SO2/yr; 0.139 lb CO/hr; 0.522 ton CO/yr; 0.079 lb PM/hr; 0.295 ton PM/yr; 0.037 lb OC/yr; and 0.137 ton OC/yr
	OAC rule 3745-17-11	the requirements of PTI #01-7415 are more stringent than the rule
	OAC rule 3745-17-07	Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.

2. Additional Terms and Conditions

- 2.a** In order to retain the ability to replace coatings with those of less toxicity and/or with a lower organic compound (OC) content, a new coating, that passes the Air Toxic Policy as described in Section A.VI, and is approved by the Ohio EPA Central District Office, shall be limited in its use as per the following formulas:

$$\text{Maximum coating use/hr (gal/hr)} = (2.40 \text{ lbs OC/hr source limit}) / (y \text{ lbs OC/gal})$$

$$\text{Maximum coating use/yr (gal/yr)} = [(7.60 \text{ tons OC/yr source limit} - 0.22 \text{ tons/yr maximum cleanup emissions}) / (y \text{ lbs OC/gal})] \times (2000 \text{ lbs/ton})$$

$$y = \text{OC content of new coatings by weight (lbs)}$$

Until such a coating is submitted with an analysis for approval, the maximum annual coating usage for the UV coating line, emissions unit R023, shall not exceed 59,904 gallons per rolling 12 months.

- 2.b** The permittee shall control the emissions from emissions unit R023 through the use of a permanent total enclosure and a thermal incinerator with a minimum destruction and removal efficiency of 95%.

II. Operational Restrictions

1. The total cleanup material used in this source shall not exceed 0.5 gallon in any hour. This limit was established to demonstrate compliance with the Ohio air toxics policy.
2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inches of water, as averaged on an hourly basis, whenever the emission unit is in operation.
3. The permittee shall operate the water curtain whenever this emissions unit is in operation.
4. The minimum combustion temperature of the incinerator shall be maintained at 1,400 degrees Fahrenheit or higher until initial emissions testing has been completed. Thereafter, the average temperature of the exhaust gases from the thermal incinerator, for any 3-hour block of time, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emission units were in compliance.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the coating operation:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and each cleanup material employed;
 - c. the total gallons of all coatings and total gallons of all cleanup materials employed;
 - d. the organic compound content of each coating and cleanup material, in pounds per gallon;
 - e. if a credit to emissions from recovered cleanup materials is to be used in emission calculations, the number of gallons of cleanup material reclaimed for off-site recycle, recovery, and/or disposal from the emissions unit;
 - f. the total organic compound emission rate for all coatings and cleanup materials, in pounds per day for the emissions unit (emissions shall be calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance or 95%, until such time testing has been conducted);
 - g. the total organic compound emission rate for all coatings and cleanup materials when using a photochemically reactive material, in pounds per day for the emissions unit;
 - h. the total number of hours the emissions unit was in operation; and
 - i. the average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (f)/(h), in pounds per hour (average).

2. The permittee shall collect and record the following information at the end of each month for the emissions unit:
 - a. the total OC emissions from all the coating and cleanup materials used in the emissions unit (lbs OC/month);
 - b. the rolling 12-month summation of total OC emissions from all the coating and cleanup materials used in the emissions unit (tons OC/rolling 12 months);
 - c. the total coating and the total cleanup material used in the emissions unit (gallons/month); and
 - d. the rolling 12-month summation of the amount of coatings used (gallons/rolling 12 months).

3. At the end of each year the permittee shall collect and record the total amount of cleanup material used during the year, less any record of cleanup material sent off-site for recovery, recycle, and/or disposal (gallons/year).

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

4. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator 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 for the control equipment:

- a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance or less than 1,400 degrees Fahrenheit until initial emissions testing has been completed.

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

5. The permittee shall install, maintain, and operate monitoring devices and a recorder which continuously and simultaneously measure and record the pressure inside and outside the permanent total enclosure surrounding R022. The monitoring and recording devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

The permittee shall continuously record the pressure differential between the inside and outside of the permanent total enclosure, when the emissions unit is in operation.

6. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:

- a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and

- b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

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

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. any record of a pressure differential deviation (excursion) report that identifies all periods of time during which the permanent total enclosure was not maintained at the required differential pressure of 0.007 inches of water, when the emissions unit was in operation;
 - b. an identification of each day, during which the average hourly OC emissions from all coatings and cleanup materials used in the source exceeded 2.40 pounds per hour, and the actual average hourly OC emissions for each such day;
 - c. an identification of any monthly record showing an exceedance of the hourly and annual cleanup usage limitation and the rolling 12-month coating usage limitation;
 - d. an identification of any monthly record showing an exceedance of the 12-month rolling emission limit of 7.60 tons, from coating and cleanup materials;
 - e. an identification of all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent performance test that demonstrated the emissions unit was in compliance, or below 1,400 degrees Fahrenheit until initial emissions testing has been completed; and
 - f. any record of downtime for the capture (collection) system, control device, and monitoring equipment, when the emissions unit was in operation.
2. The permittee shall notify the Ohio EPA Central District Office in writing of any daily record showing that the water curtain 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 Central District Office within 30 days after the event occurs.
3. The permittee shall submit annual reports of the total organic compound emissions and the total gallons of cleanup materials used during the previous calendar year. This report shall be satisfied by including this information for this emissions unit in the submission of the annual Fee Emission Report.

V. Testing Requirements

1. Hourly Emission Limitation for UV Coating Line B

2.4 pounds OC/hour

Applicable Compliance Method

Compliance with the hourly and daily OC limits shall be determined through daily recordkeeping as specified in Section A.III.1. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials. When a photochemically reactive coating or cleanup material is used, daily emissions shall be calculated by multiplying the OC content of each coating and cleanup material used (lbs OC/gallon of material) times each coating and cleanup material's usage each day, and then these emissions shall be summed for all the coatings and cleanup used.

V. Testing Requirements (continued)

2. Annual Emission Limitation

7.60 tons OC/rolling 12-months

Applicable Compliance Method

Compliance with this annual OC limit shall be determined through monthly recordkeeping as specified in Section A.III.2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials. Annual emissions shall be calculated by adding the monthly emissions, derived from daily emission calculations from coating and cleanup material use each month. Twelve month rolling emissions shall be calculated by adding the current monthly emission calculations from the source to the previous 11 month's emission calculations.

Emissions shall be calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance or 95%, until such time testing has been conducted. Therefore, the above emission calculation shall use 95% control until testing adjusts this factor.

3. Annual Rolling Coating and Cleanup Material Usage limitations

59,904 gallons of coating/rolling 12-months

The limit on the coating usage may change as per the formula in Section A.I.2.a as replacement coatings with lower OC content are approved as required in this permit.

Applicable Compliance Method

Compliance with the coating usage limit shall be determined through monthly recordkeeping of total coating and cleanup material used in this source. Rolling 12-month coating usage in this source shall be calculated each month by adding each new month's usage to the previous rolling 11-months.

4.a Annual Cleanup Material Usage limitations

660 gallons of cleanup material/year

Applicable Compliance Method

Compliance with the cleanup usage limit shall be determined through monthly recordkeeping of each cleanup material used. Cleanup materials from this source that are collected for off-site recycle, recovery, and/or disposal shall be subtracted from each monthly record of cleanup use.

4.b Hourly Cleanup Material Usage limitation

0.5 gallons of cleanup material in any single hour of time

Applicable Compliance Method

Compliance with the maximum cleanup material usage limit shall be determined through daily recordkeeping of the cleanup material used and the hours of operation.

V. Testing Requirements (continued)

5. Emission Limitation for Particulate Matter

0.28 pounds PM/hour
1.23 tons PM/year

Applicable Compliance Method

Compliance with the hourly PM limits shall be determined through daily recordkeeping of coating usage, the PM content of each coating, and operating hours per day for the source. Formulation data from the manufacturer's MSDS shall be used to determine the particulate content of the coatings. Hourly emissions shall be calculated by multiplying the maximum PM content of the coating used in the source (2 lbs. PM/gallon of coating) times the coating's maximum usage in any hour (gallons/hr.). If the source has run at the same rate all day, the maximum use in any hour can be calculated by dividing the total use at the end of that day by the hours the source ran during that day. Calculations shall be documented as follows:

PM emissions/hr = (2.0 lbs PM/gal of coating) x (coating usage in gal/hr) x (1-TE) x (1-CE) or as per above:

PM emissions/hr = (2.0 lbs PM/gal of coating) x (coating usage in gal/day) / (hours of operation/day) x (1-TE) x (1-CE) and

Annual PM emissions (in tons/yr) = (2.0 lbs PM/gal of coating) x (coating usage in gal/year) x (1-TE) x (1-CE) / (2000 lbs/ton)

TE= transfer efficiency (65% for electrostatic application)

CE= capture efficiency (95% for water wash control)

6.a Emission limitation from natural gas drying ovens and incinerator (from R022 & R023 together)

0.690 lb NOx/hr
2.582 tons NOx/yr
0.004 lb SO2/hr
0.014 tons SO2/yr
0.139 lb CO/hr
0.522 tons CO/yr
0.079 lb PM/hr
0.295 tons PM/yr
0.037 lb OC/yr
0.137 tons OC/yr

Applicable Compliance Method

Compliance with these limits shall be determined through daily recordkeeping of the number of hours of operation for sources R022 and R023 and their control device, the incinerator. These limits represent the maximum hourly natural gas usage of the incinerator and drying ovens. These emission limitations were determined by multiplying the natural gas usage (MM ft3) by the AP-42 and/or AIRS emission factor of each pollutant (lbs./MM ft3).

V. Testing Requirements (continued)

6.b Emissions of NO_x from natural gas use shall be calculated as follows:

Hourly NO_x emissions from incinerator = 100 lbs NO_x/106ft³ (emission factor) x 6000 ft³/hr (max. capacity of incinerator) plus

Hourly NO_x emissions from drying oven = 140 lbs NO_x/106ft³ (emission factor) x 320 ft³/hr (max. capacity of drying oven) x 2 (sources)

Annual NO_x emissions from incinerator = 100 lbs NO_x/106ft³ (emission factor) x 6000 ft³/hr (max. capacity of incinerator) x hrs of operation/yr / (2000 lbs/ton) plus

Annual NO_x emissions from drying oven = 140 lbs NO_x/106ft³ (emission factor) x 320 ft³/hr (max. capacity of drying oven) x hrs of operation/yr / (2000 lbs/ton) x 2 (sources)

6.c Emissions of SO₂ from natural gas use shall be calculated as follows:

Hourly SO₂ emissions from incinerator = 0.6 lbs SO₂/106ft³ (emission factor) x 6000 ft³/hr (max. capacity of incinerator) plus

Hourly SO₂ emissions from drying oven = 0.6 lbs SO₂/106ft³ (emission factor) x 320 ft³/hr (max. capacity of drying oven) x 2 (sources)

Annual SO₂ emissions from incinerator = 0.6 lbs SO₂/106ft³ (emission factor) x 6000 ft³/hr (max. capacity of incinerator) x hrs of operation/yr / (2000 lbs/ton) plus

Annual SO₂ emissions from drying oven = 0.6 lbs SO₂/106ft³ (emission factor) x 320 ft³/hr (max. capacity of drying oven) x hrs of operation/yr / (2000 lbs/ton) x 2 (sources)

6.d Emissions of CO from natural gas use shall be calculated as follows:

Hourly CO emissions from incinerator = 21 lbs CO/106ft³ (emission factor) x 6000 ft³/hr (max. capacity of incinerator) plus

Hourly CO emissions from drying oven = 21 lbs CO/106ft³ (emission factor) x 320 ft³/hr (max. capacity of drying oven) x 2 (sources)

Annual CO emissions from incinerator = 21 lbs CO/106ft³ (emission factor) x 6000 ft³/hr (max. capacity of incinerator) x hrs of operation/yr / (2000 lbs/ton) plus

Annual CO emissions from drying oven = 21 lbs CO/106ft³ (emission factor) x 320 ft³/hr (max. capacity of drying oven) x hrs of operation/yr / (2000 lbs/ton) x 2 (sources)

6.e Emissions of PM from natural gas use shall be calculated as follows:

Hourly PM emissions from incinerator = 11.9 lbs PM/106ft³ (emission factor) x 6000 ft³/hr (max. capacity of incinerator) plus

Hourly PM emissions from drying oven = 11.9 lbs PM/106ft³ (emission factor) x 320 ft³/hr (max. capacity of drying oven) x 2 (sources)

Annual PM emissions from incinerator = 11.9 lbs PM/106ft³ (emission factor) x 6000 ft³/hr (max. capacity of incinerator) x hrs of operation/yr / (2000 lbs/ton) plus

Annual PM emissions from drying oven = 11.9 lbs PM/106ft³ (emission factor) x 320 ft³/hr (max. capacity of drying oven) x hrs of operation/yr x / (2000 lbs/ton) x 2 (sources)

V. Testing Requirements (continued)

6.f Emissions of OC from natural gas use shall be calculated as follows:

Hourly OC emissions from incinerator = 5.8 lbs OC/106ft³ (emission factor) x 6000 ft³/hr (max. capacity of incinerator) plus

Hourly OC emissions from drying oven = 2.8 lbs OC/106ft³ (emission factor) x 320 ft³/hr (max. capacity of drying oven) x 2 (sources)

Annual OC emissions from incinerator = 5.8 lbs OC/106ft³ (emission factor) x 6000 ft³/hr (max. capacity of incinerator) x hrs of operation/yr / (2000 lbs/ton) plus

Annual OC emissions from drying oven = 2.8 lbs OC/106ft³ (emission factor) x 320 ft³/hr (max. capacity of drying oven) x hrs of operation/yr / (2000 lbs/ton) x 2 (sources)

6.g Since these limits represent the maximum hourly capacity of the equipment, no additional compliance determination is required beyond the daily recordkeeping of hours of operation.

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

i The emission testing shall be conducted within 6 months after issuance of the permit and within 3 months prior to permit renewal (the initial monitoring requirements may be satisfied if testing is conducted before the issuance of the Title V permit);

ii The emission testing shall be conducted to demonstrate compliance with the allowable hourly mass emission rate for organic compounds (2.4 pounds of OC/hour);

iii 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 Ohio EPA Central District Office;

iv Methods 1 through 4, 25 or 25A found in 40 CFR Part 60, Appendix A shall be employed to demonstrate compliance with the hourly allowable mass emission rate of organic compounds;

v The overall control efficiency of the incinerator for emissions unit R022 shall be demonstrated based upon the results of the capture efficiency (permanent total enclosure) and control efficiency tests. The capture efficiency or verification of permanent total enclosure 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 E.1.b. above and OAC rule 3745-21-10 or an approved alternative test protocol. 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.

V. Testing Requirements (continued)

7.b Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emission units 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 Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Central District Office 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 Ohio EPA Central District Office 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 Ohio EPA Central District Office.

VI. Miscellaneous Requirements

1. Toxics Policy Requirement

This permit allows the use of coatings and cleanup materials specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Toluene
TLV: 188 mg/m³:
Maximum Hourly Emission Rate: 3.88 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 1,166 ug/m³:
MAGLC: 4,476 ug/m³

Pollutant: Xylene
TLV: 434 mg/m³
Maximum Hourly Emission Rate: 1.31 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 394 ug/m³:
MAGLC: 10,333 ug/m³

Pollutant: n-Butyl Alcohol
TLV: 152 mg/m³
Maximum Hourly Emission Rate: 3.78 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 1,135 ug/m³:
MAGLC: 3,619 ug/m³

Pollutant: Methylcyclohexane
TLV: 1,610 mg/m³
Maximum Hourly Emission Rate: 9.07 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 2,726 ug/m³:
MAGLC: 38,333 ug/m³

Pollutant: Diacetone Alcohol
TLV: 238 mg/m³
Maximum Hourly Emission Rate: 1.44 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 432 ug/m³:
MAGLC: 5,666 ug/m³

Pollutant: Ethyl Acetate
TLV: 1,440 mg/m³
Maximum Hourly Emission Rate: 2.51 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 754 ug/m³:
MAGLC: 34,286 ug/m³

VI. Miscellaneous Requirements (continued)

Pollutant: Isopropyl Alcohol
TLV: 983 mg/m³
Maximum Hourly Emission Rate: 3.78 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 1,135 ug/m³:
MAGLC: 23,405 ug/m³

Pollutant: Methanol
TLV: 262 mg/m³
Maximum Hourly Emission Rate: 3.78 lbs/hr
Predicted 1-Hour Maximum Ground-Level Concentration: 1,135 ug/m³:
MAGLC: 6,238 ug/m³

2. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":
 - 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 specified in the above table;
 - b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
 - c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
 - d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.
3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
 - a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
 - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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**

UV Line B with drying oven

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

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