State of Ohio Environmental Protection Agency

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

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

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

05/29/02

CERTIFIED MAIL

RE: Final Title V Chapter 3745-77 permit

03-87-00-0110
Uretech International Inc.
Paul Skotynsky
21200 Luckey Road
Luckey, OH 43443-9710

Dear Paul Skotynsky:

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

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

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

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

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

Very truly yours,

Thomas G. Rigo

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

cc: Northwest District Office
File, DAPC PMU

State of Ohio Environmental Protection Agency

FINAL TITLE V PERMIT

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

This document constitutes issuance of a Title V permit for Facility ID: 03-87-00-0110 to:
Uretech International Inc.
21200 Luckey Road
Luckey, OH 43443-9710

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

K001 (Brake Roller Coat)
Brake roller coating

K002 (Brake drum coating line with drying oven)
Two brake drum spray painting booths and drying oven

P014 (Polymeric Pour #4)
Polymeric foam pouring

P019 (Polymeric Pour, #1-3)
Polymeric foam pouring

P023 (Polymeric Pour #5)
Polymeric foam pouring

P024 (Polymeric Pour #6)
Polymeric foam pouring
Polymeric foam pouring

R002 (Paint Booth #6)
Paint Booth #6

R003 (Paint Booth #2)
Paint Booth #2

R004 (Paint Booth #5)
Paint Booth #5

R006 (Paint Booth #8)
Paint Booth #8

R007 (Paint Booth #4)
Paint Booth #4

R010 (Paint Booth #3)
Paint Booth #3

R012 (Paint Booth #1)
Paint Booth #1

R013 (Paint Booth #9)
Paint Booth #9

R014 (Paint Booth #10)
Paint Booth #10

R015 (Soapline)
Sprays soap solution on parts

R016 (#1 foam unit in-mold coating booth)
East (or south) unit in-mold spray coating process

R017 (#2 foam unit in-mold coating booth)
West unit in-mold spray coating process

R018 (Paint Booth #7)
Paint Booth #7

R019 (silicon seal coat)
Manufacture and repair silicon seals used in manufacturing

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

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

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

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Record Keeping and Reporting Requirements

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

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

b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

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

i. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))
ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.) See B.6 below if no deviations occurred during the quarter.

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

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

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

2. Scheduled Maintenance/Malfunction Reporting

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

Except as provided in OAC rule 3745-15-06, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iii))

3. Risk Management Plans

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

4. Title IV Provisions

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

5. Severability Clause

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

6. General Requirements

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

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

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

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

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

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

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.
(Authority for term: OAC rule 3745-77-07(A)(8))

8. Marketable Permit Programs

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

9. Reasonably Anticipated Operating Scenarios

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

10. Reopening for Cause

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

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

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

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

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

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

11. Federal and State Enforceability

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

12. Compliance Requirements

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

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

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

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

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

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

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

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

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

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

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

13. Permit Shield

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

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

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

14. Operational Flexibility

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

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

15. Emergencies

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

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

16. Off-Permit Changes

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

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

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

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

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

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

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

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

17. Compliance Method Requirements

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

18. Insignificant Activities

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

19. Permit to Install Requirement

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

20. Air Pollution Nuisance
The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.
(Authority for term: OAC rule 3745-77-07(A)(1))

B. *State Only Enforceable Section*

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

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

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

3. Inspections and Information Requests
The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a

written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

4. Scheduled Maintenance/Malfunction Reporting

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

5. Permit Transfers

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

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

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

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

None

B. State Only Enforceable Section

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

B001 - 3.125 mmBtu/hr air make up unit, warehouse
B002 - 5.0 mmBtu/hr air make up unit, west
B003 - 5.0 mmBtu/hr air make up unit, foam pouring area
P006 - #2 foam pouring and cure oven
P007 - storage room and paint kitchen
P008 - #1 foam pouring and cure oven
P011 - paint cure oven
P015 - mold resurfacing
P016 - development lab
P020 - parts trimming
P021 - wheel washer/dryer
P022 - polymeric cure oven

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 (PTI) for the emissions unit.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Brake Roller Coat (K001)

Activity Description: Brake roller coating

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
brake roller coat	OAC rule 3745-31-05(A)(3) (PTI No. 03-7216)	65.4 lbs volatile organic compounds (VOC)/day, including cleanup The requirements of this rule also include compliance with the requirements in OAC rule 3745-21-09(U)(2)(e)(iii).
	OAC rule 3745-21-09(U)(1)	exempt, pursuant to OAC rule 3745-21-09(U)(2)(e)(iii) (See Section A.II.1.)

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. Coating usage in this emissions unit shall not exceed 10 gallons per day.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for the coating line:

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

b. the volume, in gallons, of each coating employed;

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

d. the VOC emissions for each coating employed, in pounds (b x c); and

e. the total VOC emissions for all the coatings employed, in pounds (summation of d for all coatings).

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

2. The permittee shall collect and record the following information for the purpose of determining daily VOC emissions:

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

b. the VOC content of each cleanup material, in pounds per gallon;

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

d. the VOC emissions for each cleanup material employed, in pounds (b x c);

e. the total VOC emissions for all the cleanup materials employed, in pounds (summation of d for all cleanup materials); and

f. the total VOC emissions for all the coatings and cleanup materials employed, in pounds (1.e + 2.e).

The permittee may calculate VOC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

VOC emissions from cleanup operations = [total gallons of cleanup material used x solvent density of cleanup material]-[total gallons of cleanup material sent off-site for reclamation/disposal (minus solids content of said material) x solvent density].

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage restriction of 10 gallons. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 45 days after the exceedance occurs.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the daily VOC emission limitation of 65.4 pounds. These quarterly deviation reports shall be submitted in accordance with the requirements detailed in Part I, Paragraph A.1.c of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:

65.4 pounds VOC/day

Applicable Compliance Method:

Compliance with the daily allowable VOC emission limitation shall be based upon the record keeping requirements specified in Sections A.III.1 and 2 of this permit.

1.b Emission Limitation:

coating usage shall not exceed 10 gallons/day

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

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

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: Brake drum coating line with drying oven□□ (K002)

Activity Description: Two brake drum spray painting booths and drying oven

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
brake drum coating line, with drying oven	OAC rule 3745-31-05(A)(3) (PTI No. 03-7906)	23.8 lbs volatile organic compounds (VOC)/day, including cleanup The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(i).
	OAC rule 3745-21-09(U)(1)(i)	3.0 lbs VOC/gallon of coating, excluding water and exempt solvents

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 line:

a. the name and identification number of each coating, as applied; and

b. the VOC content of each coating (in pounds/gallon, excluding water and exempt solvents), as applied.

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

2. The permittee shall collect and record the following information each day for the purpose of determining daily VOC emissions for this emissions unit:

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

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

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

d. the VOC emissions for each coating and cleanup material employed, in pounds (b x c); and

e. the total VOC emissions for all the coatings and cleanup materials employed, in pounds (summation of d for all coatings and cleanup materials).

The permittee may calculate VOC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

VOC emissions from cleanup operations = [total gallons of cleanup material used x solvent density of cleanup material] - [total gallons of cleanup material sent off-site for reclamation/disposal (minus solids content of said material) x solvent density].

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of any noncomplying coating (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the daily VOC emission limitation of 23.8 pounds. These quarterly deviation reports shall be submitted in accordance with the requirements detailed in Part I, Paragraph A.1.c of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:

23.8 pounds VOC/day

Applicable Compliance Method:

Compliance with the allowable daily VOC emission limitation shall be based upon the record keeping requirements specified in Section A.III.2 of this permit.

1.b Emission Limitation:

3.0 pounds VOC/gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

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

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: Polymeric Pour #4 (P014)

Activity Description: Polymeric foam pouring

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
polymeric urethane molding machine number 4	OAC rule 3745-31-05(A) PTI No. 03-2105	from mold release agents and cleanup materials usage: 2.0 pounds organic compounds (OC)/hour The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G).
	OAC rule 3745-21-07(G)	none (See Section A.II.1.)

2. Additional Terms and Conditions

2.a The 2.0 pounds/hour OC emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this emission limitation.

II. Operational Restrictions

1. The permittee shall not employ any coating (i.e., mold release agent) and/or cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain the following information each day for this emissions unit:

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

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

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any daily record showing the use of noncomplying materials (i.e., photochemically reactive materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days of the date of the daily record indicating noncompliance.

V. Testing Requirements

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

1.a Emission Limitation:

2.0 pounds OC/hour

Applicable Compliance Method:

The OC emission limitation above was established by:

i. multiplying the maximum methylene chloride usage (0.038 gallon/hour) by the density (10.98 pounds OC/gallon);

ii. multiplying the maximum toluene usage (0.034 gallon/hour) by the density (7.26 pounds OC/gallon);

iii. multiplying the maximum acetone usage (0.038 gallon/hour) by the density (6.59 pounds OC/gallon);

iv. multiplying the maximum VM&P naphtha usage (0.17 gallon/hour) by the density (6.15 pounds OC/gallon); and

v. summing i, ii, iii and iv.

If required, the permittee shall demonstrate compliance with the allowable hourly OC emission limitation in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

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

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: Polymeric Pour, #1-3 (P019)

Activity Description: Polymeric foam pouring

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
polymeric urethane molding machines 1, 2 and 3	OAC rule 3745-31-05(A) PTI No. 03-2316	from mold release agents and cleanup material usage: 3.3 pounds organic compounds (OC)/hour The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G).
	OAC rule 3745-21-07(G)	none (See Section A.II.1.)

2. Additional Terms and Conditions

2.a The 3.3 pounds/hour OC emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this emission limitation.

II. Operational Restrictions

1. The permittee shall not employ any coating (i.e., mold release agent) and/or cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain the following information each day for this emissions unit:

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

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

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any daily record showing the use of noncomplying materials (i.e., photochemically reactive materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days of the date of the daily record indicating noncompliance.

V. Testing Requirements

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

1.a Emission Limitation:

3.3 pounds OC/hour

Applicable Compliance Method:

The OC emission limitation above was established by:

i. multiplying the maximum methylene chloride usage (0.16 gallon/hour) by the density (10.98 pounds OC/gallon);

ii. multiplying the maximum VM&P naphtha usage (0.23 gallon/hour) by the density (6.15 pounds OC/gallon); and

iii. summing i and ii.

If required, the permittee shall demonstrate compliance with the allowable hourly OC emission limitation in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

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

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: Polymeric Pour #5 (P023)

Activity Description: Polymeric foam pouring

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
polymeric urethane molding machine number 5	OAC rule 3745-31-05(A) PTI No. 03-13594	from mold release application: 3.94 pounds organic compounds (OC)/hour from cleanup material usage: 188.6 pounds OC/month, 1.13 tons OC/year The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G) and 3745-31-05(D).
	OAC rule 3745-31-05(D) PTI No. 03-13594	from mold release application: 7.93 tons OC/rolling, 365-day period, from emissions units P023 and P024, combined See Section A.I.2.a.
	OAC rule 3745-21-07(G)	none (See Section A.II.1.)

2. Additional Terms and Conditions

2.a The permittee has requested the following federally enforceable emission restrictions for the purposes of establishing the company as a PSD minor facility:

The annual OC emissions from the mold release application from emissions units P023 and P024, combined, shall not exceed 7.93 tons/year, based on a rolling, 365-day summation of the daily OC input rates.*

* OC input rates = OC emission rates

2.b The 3.94 pounds OC/hour emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

II. Operational Restrictions

1. The permittee shall not employ any coating (i.e., mold release agent) and/or cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain the following information each day for this emissions unit:

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

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

2. The permittee shall collect and record the following information for each day for emissions units P023 and P024, combined:

a. the company identification for each coating (i.e., mold release agent) employed;

b. the OC content of each coating, in pounds/gallon, as applied;

c. the number of gallons of each coating employed;

d. the OC emission rate for each coating employed (b x c), in pounds;

e. the total OC emission rate for all the coatings employed [summation of d for all coatings], in pounds; and

f. the rolling, 365-day summation of the daily OC emission rates, in tons.

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

a. the company identification for each cleanup material employed;

b. the OC content of each cleanup material, in pounds/gallon, as applied ;

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

d. the OC emission rate for each cleanup material employed (b x c), in pounds; and

e. the total OC emission rate for all the cleanup materials employed [summation of d for all cleanup materials], in pounds.

The company may calculate the OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal.

OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material)-(total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material]) x solvent density.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any daily record showing the use of noncomplying materials (i.e., photochemically reactive materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days of the date of the daily record indicating noncompliance.

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly deviation (excursion) reports hat identify the following:

a. all exceedances of the rolling, 365-day OC emission limitation of 7.93 tons (for emissions units P023 and P024, combined); and

b. all exceedances of the monthly OC emission limitation (from cleanup materials) of 188.6 pounds (for this emissions unit).

Unless otherwise specified, the quarterly deviation reports shall be submitted in accordance with Part I - General Terms and Conditions of this permit.

V. Testing Requirements

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

1.a Emission Limitation:

3.94 pounds OC/hour, from mold release (for this emissions unit)

Applicable Compliance Method:

The hourly allowable OC emission limitation above was established by multiplying the maximum hourly coating usage rate (gallons/hr) by the maximum OC content of all the coatings employed (lbs OC/gallon).

If required, the permittee shall demonstrate compliance with the allowable hourly OC emission limitation in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

1.b Emission Limitations:

188.6 pounds OC/month, 1.13 tons OC/year, from cleanup materials (for this emissions unit)

Applicable Compliance Method:

The record keeping requirements in section A.III.3 of this permit shall be used to determine compliance with the monthly allowable OC emission limitation above. Compliance with the annual allowable OC emission limitation shall be demonstrated based on the record keeping requirements in section A.III.3 and shall be the summation of the monthly OC emission rates for the calendar year.

1.c Emission Limitation:

7.93 tons OC/year, based on a rolling, 365-day summation of the OC input rates from all the coatings (for emissions units P023 and P024, combined)

Applicable Compliance Method:

The record keeping requirements in section A.III.2 of this permit shall be used to determine compliance with the annual allowable OC emission limitation above.

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
polymeric urethane molding machine number 5	none	none

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

1. Pursuant to Engineering Guide #69, modeling to demonstrate compliance with Ohio EPA's Air Toxic Policy was not necessary since the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. 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 OAC rule 3745-31-01. The permittee is hereby advised that 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 to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Polymeric Pour #6 (P024)

Activity Description: Polymeric foam pouring
Polymeric foam pouring

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
polymeric urethane molding machine number 6	OAC rule 3745-31-05(A) PTI No. 03-13594	from mold release application: 3.94 pounds organic compounds (OC)/hour from cleanup material usage: 188.6 pounds OC/month, 1.13 tons OC/year The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G) and 3745-31-05(D).
	OAC rule 3745-31-05(D) PTI No. 03-13594	from mold release application: 7.93 tons OC/rolling, 365-day period, from emissions units P023 and P024, combined See Section A.I.2.a.
	OAC rule 3745-21-07(G)	none (See Section A.II.1.)

2. Additional Terms and Conditions

2.a The permittee has requested the following federally enforceable emission restrictions for the purposes of establishing the company as a PSD minor facility:

The annual OC emissions from the mold release application from emissions units P023 and P024, combined, shall not exceed 7.93 tons/year, based on a rolling, 365-day summation of the daily OC input rates.*

* OC input rates = OC emission rates

2.b The 3.94 pounds OC/hour emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

II. Operational Restrictions

1. The permittee shall not employ any coating (i.e., mold release agent) and/or cleanup material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain the following information each day for this emissions unit:

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

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

2. The permittee shall collect and record the following information for each day for emissions units P023 and P024, combined:

a. the company identification for each coating (i.e., mold release agent) employed;

b. the OC content of each coating, in pounds/gallon, as applied;

c. the number of gallons of each coating employed;

d. the OC emission rate for each coating employed (b x c), in pounds;

e. the total OC emission rate for all the coatings employed [summation of d for all coatings], in pounds; and

f. the rolling, 365-day summation of the daily OC emission rates, in tons.

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

a. the company identification for each cleanup material employed;

b. the OC content of each cleanup material, in pounds/gallon, as applied ;

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

d. the OC emission rate for each cleanup material employed (b x c), in pounds; and

e. the total OC emission rate for all the cleanup materials employed [summation of d for all cleanup materials], in pounds.

The company may calculate the OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal.

OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material)-(total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material]) x solvent density.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any daily record showing the use of noncomplying materials (i.e., photochemically reactive materials) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days of the date of the daily record indicating noncompliance.

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly deviation (excursion) reports hat identify the following:

a. all exceedances of the rolling, 365-day OC emission limitation of 7.93 tons (for emissions units P023 and P024, combined); and

b. all exceedances of the monthly OC emission limitation (from cleanup materials) of 188.6 pounds (for this emissions unit).

Unless otherwise specified, the quarterly deviation reports shall be submitted in accordance with Part I - General Terms and Conditions of this permit.

V. Testing Requirements

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

1.a Emission Limitation:

3.94 pounds OC/hour, from mold release (for this emissions unit)

Applicable Compliance Method:

The hourly allowable OC emission limitation above was established by multiplying the maximum hourly coating usage rate (gallons/hr) by the maximum OC content of all the coatings employed (lbs OC/gallon).

If required, the permittee shall demonstrate compliance with the allowable hourly OC emission limitation in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

1.b Emission Limitations:

188.6 pounds OC/month, 1.13 tons OC/year, from cleanup materials (for this emissions unit)

Applicable Compliance Method:

The record keeping requirements in section A.III.3 of this permit shall be used to determine compliance with the monthly allowable OC emission limitation above. Compliance with the annual allowable OC emission limitation shall be demonstrated based on the record keeping requirements in section A.III.3 and shall be the summation of the monthly OC emission rates for the calendar year.

1.c Emission Limitation:

7.93 tons OC/year, based on a rolling, 365-day summation of the OC input rates from all the coatings (for emissions units P023 and P024, combined)

Applicable Compliance Method:

The record keeping requirements in section A.III.2 of this permit shall be used to determine compliance with the annual allowable OC emission limitation above.

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
polymeric urethane molding machine number 6	none	none

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

1. Pursuant to Engineering Guide #69, modeling to demonstrate compliance with Ohio EPA's Air Toxic Policy was not necessary since the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. 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 OAC rule 3745-31-01. The permittee is hereby advised that 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 to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Booth #6 (R002)

Activity Description: Paint Booth #6

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
steel/plastic parts paint spray booth (paint booth #6), with dry filtration system	OAC rule 3745-31-05(A)(3) (PTI No. 03-13335)	for the coating of metal and plastic parts: 402.96 pounds volatile organic compounds (VOC)/day, 73.54 tons VOC/year, from the use of coatings 181.5 pounds VOC/month, 1.09 tons VOC/year, from the use of cleanup materials 0.54 pound particulate emissions (PE)/hour, 2.37 tons PE/year Visible PE shall not exceed 0 percent opacity, as a 6-minute average. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c), 3745-31-05(D) and 3745-21-07(G).
	OAC rule 3745-31-05(D) (PTI No. 03-13335)	97.0 tons VOC/rolling, 365-day period (See A.I.2.a.)
	OAC rule 3745-21-09(U)(1)(c)	on any day when coating metal parts, 3.5 pounds VOC/gallon of coating, excluding water and exempt solvents (for extreme performance coatings) for the coatings used for the metal parts
	OAC rule 3745-21-07(G)	On any day when coating non-metal parts, see Section A.II.1.
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-17-07(A)	none (See A.I.2.b.)

2. Additional Terms and Conditions

2.a The permittee has requested the following federally enforceable VOC emission restriction for the purpose of establishing the facility as a minor facility for PSD:

The total VOC emissions (from the use of coatings and cleanup materials) from emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, combined, shall not exceed 97.0 tons/year, based on a rolling, 365-day summation of the daily VOC input rates.

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

2.c The VOC emission limitations of 402.96 lbs/day, 73.54 tons/year, 181.5 lbs/month and 1.09 tons/year were established for PTI purposes to reflect the emissions unit's potentials to emit. Therefore, it is not necessary to establish monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.

II. Operational Restrictions

1. When coating plastic parts, the permittee shall not employ any coating or cleanup material in this emissions unit for the plastic parts that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

2. When coating metal parts, the permittee shall only employ coatings for the metal parts that comply with the VOC content limitation of 3.5 pounds VOC/gallon of coating, excluding water and exempt solvents.

3. The permittee shall operate the dry filtration system 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 month for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, as a group, for metal parts coating operations:

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

b. the VOC content of each coating employed, in pounds per gallon (excluding water and exempt solvents), as applied.

2. The permittee shall collect and record the following information each month for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, as a group, for plastic parts coating operations:

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

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

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

3. The permittee shall collect and record the following information each day for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, as a group, for coatings and cleanup materials employed (for metal and plastic parts):

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

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

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

d. the VOC emission rate* for each coating and cleanup material employed, in pounds (b x c);

e. the total VOC emissions for all the coatings and cleanup materials employed (summation of d for all coatings and cleanup materials), in pounds; and

f. the rolling, 365-day summation of the daily VOC emission rates, in tons.

* The permittee may calculate the VOC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

VOC emissions from cleanup operations = [total gallons of cleanup material used x solvent density of cleanup material]-[total gallons of cleanup material sent off-site for reclamation/disposal (minus solids content of said material) x solvent density].

4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of noncomplying coatings for metal parts (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of noncomplying coatings or cleanup materials for plastic parts (i.e., photochemically reactive materials). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.

4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 365-day VOC emission limitation of 97 tons (for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, combined). These quarterly deviation reports shall be submitted in accordance with the requirements detailed in Part I, Paragraph A.1.c of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitation:

VOC emissions (from the use of coatings and cleanup materials) for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, combined, shall not exceed 97.0 tons/year, based on a rolling, 365-day summation of the daily VOC input rates

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.3 of this permit.

1.b Emission Limitation:

3.5 pounds VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance with the VOC content limitation above shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

1.c Emission Limitations:

0.54 pound PE/hour, 2.37 tons PE/year

Applicable Compliance Method:

To determine the actual worst-case PE rate (E), the following equation may be used for the paint spraying operations:

E = maximum coating solids usage rate, in pounds/hour x (1-TE) x (1-CE)

where:

E = PE rate (pounds/hour)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (65 percent, per company-supplied data)

CE = control efficiency of the control equipment (assumed to be 95 percent)

The annual allowable PE limitation was developed by multiplying the hourly allowable PE limitation by 8760, and then dividing by 2000. Therefore, provided compliance is shown with the hourly allowable PE limitation, compliance shall also be shown with the annual allowable PE limitation.

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation above pursuant to 40 CFR, Part 60, Appendix A, Methods 1 through 5.

1.d Emission Limitation:

Visible particulate emissions shall not exceed 0 percent opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

V. Testing Requirements (continued)

1.e Emission Limitations:

402.96 pounds VOC/day, 73.54 tons VOC/year (for coatings)

Applicable Compliance Method:

The daily allowable VOC emission limitation was established by determining the highest VOC emissions scenario for any given day. This was done by multiplying the maximum daily usage rate for each coating material (gallons/day) by the VOC content of that coating material (lbs/gallon). The scenario that resulted in the highest VOC emissions equals the daily allowable VOC emission limitation.

The annual allowable VOC emission limitation was developed by multiplying the daily allowable VOC emission limitation by 365, and then dividing by 2000. Therefore, provided compliance is shown with the daily allowable VOC emission limitation, compliance shall also be shown with the annual allowable VOC emission limitation.

1.f Emission Limitations:

181.5 pounds VOC/month, 1.09 tons VOC/year (for cleanup materials)

Applicable Compliance Method:

The monthly allowable VOC emission limitation was established by determining the highest VOC emissions scenario for any given month. This was done by multiplying the maximum monthly usage rate for each cleanup material (gallons/month) by the VOC content of that cleanup material (lbs/gallon). The scenario that resulted in the highest VOC emissions equals the monthly allowable VOC emission limitation.

The annual allowable VOC emission limitation was developed by multiplying the monthly allowable VOC emission limitation by 12, and then dividing by 2000. Therefore, provided compliance is shown with the monthly allowable VOC emission limitation, compliance shall also be shown with the annual allowable VOC emission limitation.

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
steel/plastic parts paint spray booth (paint booth #6), with dry filtration	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Hexamethylene Diisocyanate
TLV (mg/m3): 0.0344
Maximum Hourly Emission Rate (lbs/hr): 0.0020
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.249
MAGLC (ug/m3): 0.8191

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

2.a changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

2.b changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Booth #2 (R003)

Activity Description: Paint Booth #2

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
steel/plastic parts paint spray booth (paint booth #2), with dry filtration system	OAC rule 3745-31-05(A)(3) (PTI No. 03-13335)	for the coating of metal and plastic parts: 402.96 pounds volatile organic compounds (VOC)/day, 73.54 tons VOC/year, from the use of coatings 181.5 pounds VOC/month, 1.09 tons VOC/year, from the use of cleanup materials 0.54 pound particulate emissions (PE)/hour, 2.37 tons PE/year Visible PE shall not exceed 0 percent opacity, as a 6-minute average. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c), 3745-31-05(D) and 3745-21-07(G).
	OAC rule 3745-31-05(D) (PTI No. 03-13335)	97.0 tons VOC/rolling, 365-day period (See A.I.2.a.)
	OAC rule 3745-21-09(U)(1)(c)	on any day when coating metal parts, 3.5 pounds VOC/gallon of coating, excluding water and exempt solvents (for extreme performance coatings) for the coatings used for the metal parts
	OAC rule 3745-21-07(G)	On any day when coating non-metal parts, see Section A.II.1.
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-17-07(A)	none (See A.I.2.b.)

2. Additional Terms and Conditions

2.a The permittee has requested the following federally enforceable VOC emission restriction for the purpose of establishing the facility as a minor facility for PSD:

The total VOC emissions (from the use of coatings and cleanup materials) from emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, combined, shall not exceed 97.0 tons/year, based on a rolling, 365-day summation of the daily VOC input rates.

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

2.c The VOC emission limitations of 402.96 lbs/day, 73.54 tons/year, 181.5 lbs/month and 1.09 tons/year were established for PTI purposes to reflect the emissions unit's potentials to emit. Therefore, it is not necessary to establish monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.

II. Operational Restrictions

1. When coating plastic parts, the permittee shall not employ any coating or cleanup material in this emissions unit for the plastic parts that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

2. When coating metal parts, the permittee shall only employ coatings for the metal parts that comply with the VOC content limitation of 3.5 pounds VOC/gallon of coating, excluding water and exempt solvents.

3. The permittee shall operate the dry filtration system 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 month for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, as a group, for metal parts coating operations:

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

b. the VOC content of each coating employed, in pounds per gallon (excluding water and exempt solvents), as applied.

2. The permittee shall collect and record the following information each month for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, as a group, for plastic parts coating operations:

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

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

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

3. The permittee shall collect and record the following information each day for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, as a group, for coatings and cleanup materials employed (for metal and plastic parts):

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

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

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

d. the VOC emission rate* for each coating and cleanup material employed, in pounds (b x c);

e. the total VOC emissions for all the coatings and cleanup materials employed (summation of d for all coatings and cleanup materials), in pounds; and

f. the rolling, 365-day summation of the daily VOC emission rates, in tons.

* The permittee may calculate the VOC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

VOC emissions from cleanup operations = [total gallons of cleanup material used x solvent density of cleanup material]-[total gallons of cleanup material sent off-site for reclamation/disposal (minus solids content of said material) x solvent density].

4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of noncomplying coatings for metal parts (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of noncomplying coatings or cleanup materials for plastic parts (i.e., photochemically reactive materials). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.

4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 365-day VOC emission limitation of 97 tons (for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, combined). These quarterly deviation reports shall be submitted in accordance with the requirements detailed in Part I, Paragraph A.1.c of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitation:

VOC emissions (from the use of coatings and cleanup materials) for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, combined, shall not exceed 97.0 tons/year, based on a rolling, 365-day summation of the daily VOC input rates

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.3 of this permit.

1.b Emission Limitation:

3.5 pounds VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance with the VOC content limitation above shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

1.c Emission Limitations:

0.54 pound PE/hour, 2.37 tons PE/year

Applicable Compliance Method:

To determine the actual worst-case PE rate (E), the following equation may be used for the paint spraying operations:

E = maximum coating solids usage rate, in pounds/hour x (1-TE) x (1-CE)

where:

E = PE rate (pounds/hour)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (65 percent, per company-supplied data)

CE = control efficiency of the control equipment (assumed to be 95 percent)

The annual allowable PE limitation was developed by multiplying the hourly allowable PE limitation by 8760, and then dividing by 2000. Therefore, provided compliance is shown with the hourly allowable PE limitation, compliance shall also be shown with the annual allowable PE limitation.

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation above pursuant to 40 CFR, Part 60, Appendix A, Methods 1 through 5.

1.d Emission Limitation:

Visible particulate emissions shall not exceed 0 percent opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

V. Testing Requirements (continued)

1.e Emission Limitations:

402.96 pounds VOC/day, 73.54 tons VOC/year (for coatings)

Applicable Compliance Method:

The daily allowable VOC emission limitation was established by determining the highest VOC emissions scenario for any given day. This was done by multiplying the maximum daily usage rate for each coating material (gallons/day) by the VOC content of that coating material (lbs/gallon). The scenario that resulted in the highest VOC emissions equals the daily allowable VOC emission limitation.

The annual allowable VOC emission limitation was developed by multiplying the daily allowable VOC emission limitation by 365, and then dividing by 2000. Therefore, provided compliance is shown with the daily allowable VOC emission limitation, compliance shall also be shown with the annual allowable VOC emission limitation.

1.f Emission Limitations:

181.5 pounds VOC/month, 1.09 tons VOC/year (for cleanup materials)

Applicable Compliance Method:

The monthly allowable VOC emission limitation was established by determining the highest VOC emissions scenario for any given month. This was done by multiplying the maximum monthly usage rate for each cleanup material (gallons/month) by the VOC content of that cleanup material (lbs/gallon). The scenario that resulted in the highest VOC emissions equals the monthly allowable VOC emission limitation.

The annual allowable VOC emission limitation was developed by multiplying the monthly allowable VOC emission limitation by 12, and then dividing by 2000. Therefore, provided compliance is shown with the monthly allowable VOC emission limitation, compliance shall also be shown with the annual allowable VOC emission limitation.

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
steel/plastic parts paint spray booth (paint booth #2), with dry filtration	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Hexamethylene Diisocyanate
TLV (mg/m3): 0.0344
Maximum Hourly Emission Rate (lbs/hr): 0.0020
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.249
MAGLC (ug/m3): 0.8191

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

2.a changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

2.b changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Booth #5 (R004)

Activity Description: Paint Booth #5

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
steel/plastic parts paint spray booth (paint booth #5), with dry filtration	OAC rule 3745-31-05(A)(3) (PTI No. 03-13335)	for the coating of metal and plastic parts: 402.96 pounds volatile organic compounds (VOC)/day, 73.54 tons VOC/year, from the use of coatings 181.5 pounds VOC/month, 1.09 tons VOC/year, from the use of cleanup materials 0.54 pound particulate emissions (PE)/hour, 2.37 tons PE/year Visible PE shall not exceed 0 percent opacity, as a 6-minute average. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c), 3745-31-05(D) and 3745-21-07(G).
	OAC rule 3745-31-05(D) (PTI No. 03-13335)	97.0 tons VOC/rolling, 365-day period (See A.I.2.a.)
	OAC rule 3745-21-09(U)(1)(c)	on any day when coating metal parts, 3.5 pounds VOC/gallon of coating, excluding water and exempt solvents (for extreme performance coatings) for the coatings used for the metal parts
	OAC rule 3745-21-07(G)	On any day when coating non-metal parts, see Section A.II.1.
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-17-07(A)	none (See A.I.2.b.)

2. Additional Terms and Conditions

2.a The permittee has requested the following federally enforceable VOC emission restriction for the purpose of establishing the facility as a minor facility for PSD:

The total VOC emissions (from the use of coatings and cleanup materials) from emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, combined, shall not exceed 97.0 tons/year, based on a rolling, 365-day summation of the daily VOC input rates.

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

2.c The VOC emission limitations of 402.96 lbs/day, 73.54 tons/year, 181.5 lbs/month and 1.09 tons/year were established for PTI purposes to reflect the emissions unit's potentials to emit. Therefore, it is not necessary to establish monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.

II. Operational Restrictions

1. When coating plastic parts, the permittee shall not employ any coating or cleanup material in this emissions unit for the plastic parts that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

2. When coating metal parts, the permittee shall only employ coatings for the metal parts that comply with the VOC content limitation of 3.5 pounds VOC/gallon of coating, excluding water and exempt solvents.

3. The permittee shall operate the dry filtration system 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 month for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, as a group, for metal parts coating operations:

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

b. the VOC content of each coating employed, in pounds per gallon (excluding water and exempt solvents), as applied.

2. The permittee shall collect and record the following information each month for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, as a group, for plastic parts coating operations:

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

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

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

3. The permittee shall collect and record the following information each day for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, as a group, for coatings and cleanup materials employed (for metal and plastic parts):

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

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

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

d. the VOC emission rate* for each coating and cleanup material employed, in pounds (b x c);

e. the total VOC emissions for all the coatings and cleanup materials employed (summation of d for all coatings and cleanup materials), in pounds; and

f. the rolling, 365-day summation of the daily VOC emission rates, in tons.

* The permittee may calculate the VOC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

VOC emissions from cleanup operations = [total gallons of cleanup material used x solvent density of cleanup material]-[total gallons of cleanup material sent off-site for reclamation/disposal (minus solids content of said material) x solvent density].

4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of noncomplying coatings for metal parts (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of noncomplying coatings or cleanup materials for plastic parts (i.e., photochemically reactive materials). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.

4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 365-day VOC emission limitation of 97 tons (for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, combined). These quarterly deviation reports shall be submitted in accordance with the requirements detailed in Part I, Paragraph A.1.c of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitation:

VOC emissions (from the use of coatings and cleanup materials) for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, combined, shall not exceed 97.0 tons/year, based on a rolling, 365-day summation of the daily VOC input rates

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.3 of this permit.

1.b Emission Limitation:

3.5 pounds VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance with the VOC content limitation above shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

1.c Emission Limitations:

0.54 pound PE/hour, 2.37 tons PE/year

Applicable Compliance Method:

To determine the actual worst-case PE rate (E), the following equation may be used for the paint spraying operations:

E = maximum coating solids usage rate, in pounds/hour x (1-TE) x (1-CE)

where:

E = PE rate (pounds/hour)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (65 percent, per company-supplied data)

CE = control efficiency of the control equipment (assumed to be 95 percent)

The annual allowable PE limitation was developed by multiplying the hourly allowable PE limitation by 8760, and then dividing by 2000. Therefore, provided compliance is shown with the hourly allowable PE limitation, compliance shall also be shown with the annual allowable PE limitation.

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation above pursuant to 40 CFR, Part 60, Appendix A, Methods 1 through 5.

1.d Emission Limitation:

Visible particulate emissions shall not exceed 0 percent opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

V. Testing Requirements (continued)

1.e Emission Limitations:

402.96 pounds VOC/day, 73.54 tons VOC/year (for coatings)

Applicable Compliance Method:

The daily allowable VOC emission limitation was established by determining the highest VOC emissions scenario for any given day. This was done by multiplying the maximum daily usage rate for each coating material (gallons/day) by the VOC content of that coating material (lbs/gallon). The scenario that resulted in the highest VOC emissions equals the daily allowable VOC emission limitation.

The annual allowable VOC emission limitation was developed by multiplying the daily allowable VOC emission limitation by 365, and then dividing by 2000. Therefore, provided compliance is shown with the daily allowable VOC emission limitation, compliance shall also be shown with the annual allowable VOC emission limitation.

1.f Emission Limitations:

181.5 pounds VOC/month, 1.09 tons VOC/year (for cleanup materials)

Applicable Compliance Method:

The monthly allowable VOC emission limitation was established by determining the highest VOC emissions scenario for any given month. This was done by multiplying the maximum monthly usage rate for each cleanup material (gallons/month) by the VOC content of that cleanup material (lbs/gallon). The scenario that resulted in the highest VOC emissions equals the monthly allowable VOC emission limitation.

The annual allowable VOC emission limitation was developed by multiplying the monthly allowable VOC emission limitation by 12, and then dividing by 2000. Therefore, provided compliance is shown with the monthly allowable VOC emission limitation, compliance shall also be shown with the annual allowable VOC emission limitation.

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
steel/plastic parts paint spray booth (paint booth #5), with dry filtration	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Hexamethylene Diisocyanate
TLV (mg/m3): 0.0344
Maximum Hourly Emission Rate (lbs/hr): 0.0020
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.249
MAGLC (ug/m3): 0.8191

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

2.a changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

2.b changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Booth #8 (R006)

Activity Description: Paint Booth #8

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
steel/plastic parts paint spray booth (paint booth #8), with dry filtration	OAC rule 3745-31-05(A)(3) (PTI No. 03-13335)	for the coating of metal and plastic parts: 402.96 pounds volatile organic compounds (VOC)/day, 73.54 tons VOC/year, from the use of coatings 181.5 pounds VOC/month, 1.09 tons VOC/year, from the use of cleanup materials 0.54 pound particulate emissions (PE)/hour, 2.37 tons PE/year Visible PE shall not exceed 0 percent opacity, as a 6-minute average. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c), 3745-31-05(D) and 3745-21-07(G).
	OAC rule 3745-31-05(D) (PTI No. 03-13335)	97.0 tons VOC/rolling, 365-day period (See A.I.2.a.)
	OAC rule 3745-21-09(U)(1)(c)	on any day when coating metal parts, 3.5 pounds VOC/gallon of coating, excluding water and exempt solvents (for extreme performance coatings) for the coatings used for the metal parts
	OAC rule 3745-21-07(G)	On any day when coating non-metal parts, see Section A.II.1.
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-17-07(A)	none (See A.I.2.b.)

2. Additional Terms and Conditions

2.a The permittee has requested the following federally enforceable VOC emission restriction for the purpose of establishing the facility as a minor facility for PSD:

The total VOC emissions (from the use of coatings and cleanup materials) from emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, combined, shall not exceed 97.0 tons/year, based on a rolling, 365-day summation of the daily VOC input rates.

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

2.c The VOC emission limitations of 402.96 lbs/day, 73.54 tons/year, 181.5 lbs/month and 1.09 tons/year were established for PTI purposes to reflect the emissions unit's potentials to emit. Therefore, it is not necessary to establish monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.

II. Operational Restrictions

1. When coating plastic parts, the permittee shall not employ any coating or cleanup material in this emissions unit for the plastic parts that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

2. When coating metal parts, the permittee shall only employ coatings for the metal parts that comply with the VOC content limitation of 3.5 pounds VOC/gallon of coating, excluding water and exempt solvents.

3. The permittee shall operate the dry filtration system 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 month for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, as a group, for metal parts coating operations:

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

b. the VOC content of each coating employed, in pounds per gallon (excluding water and exempt solvents), as applied.

2. The permittee shall collect and record the following information each month for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, as a group, for plastic parts coating operations:

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

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

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

3. The permittee shall collect and record the following information each day for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, as a group, for coatings and cleanup materials employed (for metal and plastic parts):

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

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

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

d. the VOC emission rate* for each coating and cleanup material employed, in pounds (b x c);

e. the total VOC emissions for all the coatings and cleanup materials employed (summation of d for all coatings and cleanup materials), in pounds; and

f. the rolling, 365-day summation of the daily VOC emission rates, in tons.

* The permittee may calculate the VOC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

VOC emissions from cleanup operations = [total gallons of cleanup material used x solvent density of cleanup material]-[total gallons of cleanup material sent off-site for reclamation/disposal (minus solids content of said material) x solvent density].

4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of noncomplying coatings for metal parts (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of noncomplying coatings or cleanup materials for plastic parts (i.e., photochemically reactive materials). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.

4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 365-day VOC emission limitation of 97 tons (for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, combined). These quarterly deviation reports shall be submitted in accordance with the requirements detailed in Part I, Paragraph A.1.c of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitation:

VOC emissions (from the use of coatings and cleanup materials) for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, combined, shall not exceed 97.0 tons/year, based on a rolling, 365-day summation of the daily VOC input rates

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.3 of this permit.

1.b Emission Limitation:

3.5 pounds VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance with the VOC content limitation above shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

1.c Emission Limitations:

0.54 pound PE/hour, 2.37 tons PE/year

Applicable Compliance Method:

To determine the actual worst-case PE rate (E), the following equation may be used for the paint spraying operations:

E = maximum coating solids usage rate, in pounds/hour x (1-TE) x (1-CE)

where:

E = PE rate (pounds/hour)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (65 percent, per company-supplied data)

CE = control efficiency of the control equipment (assumed to be 95 percent)

The annual allowable PE limitation was developed by multiplying the hourly allowable PE limitation by 8760, and then dividing by 2000. Therefore, provided compliance is shown with the hourly allowable PE limitation, compliance shall also be shown with the annual allowable PE limitation.

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation above pursuant to 40 CFR, Part 60, Appendix A, Methods 1 through 5.

1.d Emission Limitation:

Visible particulate emissions shall not exceed 0 percent opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

V. Testing Requirements (continued)

1.e Emission Limitations:

402.96 pounds VOC/day, 73.54 tons VOC/year (for coatings)

Applicable Compliance Method:

The daily allowable VOC emission limitation was established by determining the highest VOC emissions scenario for any given day. This was done by multiplying the maximum daily usage rate for each coating material (gallons/day) by the VOC content of that coating material (lbs/gallon). The scenario that resulted in the highest VOC emissions equals the daily allowable VOC emission limitation.

The annual allowable VOC emission limitation was developed by multiplying the daily allowable VOC emission limitation by 365, and then dividing by 2000. Therefore, provided compliance is shown with the daily allowable VOC emission limitation, compliance shall also be shown with the annual allowable VOC emission limitation.

1.f Emission Limitations:

181.5 pounds VOC/month, 1.09 tons VOC/year (for cleanup materials)

Applicable Compliance Method:

The monthly allowable VOC emission limitation was established by determining the highest VOC emissions scenario for any given month. This was done by multiplying the maximum monthly usage rate for each cleanup material (gallons/month) by the VOC content of that cleanup material (lbs/gallon). The scenario that resulted in the highest VOC emissions equals the monthly allowable VOC emission limitation.

The annual allowable VOC emission limitation was developed by multiplying the monthly allowable VOC emission limitation by 12, and then dividing by 2000. Therefore, provided compliance is shown with the monthly allowable VOC emission limitation, compliance shall also be shown with the annual allowable VOC emission limitation.

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
steel/plastic parts paint spray booth (paint booth #8), with dry filtration	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Hexamethylene Diisocyanate
TLV (mg/m3): 0.0344
Maximum Hourly Emission Rate (lbs/hr): 0.0020
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.249
MAGLC (ug/m3): 0.8191

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

2.a changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

2.b changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Booth #4 (R007)

Activity Description: Paint Booth #4

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
steel/plastic parts paint spray booth (paint booth #4), with dry filtration	OAC rule 3745-31-05(A)(3) (PTI No. 03-13335)	for the coating of metal and plastic parts: 402.96 pounds volatile organic compounds (VOC)/day, 73.54 tons VOC/year, from the use of coatings 181.5 pounds VOC/month, 1.09 tons VOC/year, from the use of cleanup materials 0.54 pound particulate emissions (PE)/hour, 2.37 tons PE/year Visible PE shall not exceed 0 percent opacity, as a 6-minute average. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c), 3745-31-05(D) and 3745-21-07(G).
	OAC rule 3745-31-05(D) (PTI No. 03-13335)	97.0 tons VOC/rolling, 365-day period (See A.I.2.a.)
	OAC rule 3745-21-09(U)(1)(c)	on any day when coating metal parts, 3.5 pounds VOC/gallon of coating, excluding water and exempt solvents (for extreme performance coatings) for the coatings used for the metal parts
	OAC rule 3745-21-07(G)	On any day when coating non-metal parts, see Section A.II.1.
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-17-07(A)	none (See A.I.2.b.)

2. Additional Terms and Conditions

2.a The permittee has requested the following federally enforceable VOC emission restriction for the purpose of establishing the facility as a minor facility for PSD:

The total VOC emissions (from the use of coatings and cleanup materials) from emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, combined, shall not exceed 97.0 tons/year, based on a rolling, 365-day summation of the daily VOC input rates.

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

2.c The VOC emission limitations of 402.96 lbs/day, 73.54 tons/year, 181.5 lbs/month and 1.09 tons/year were established for PTI purposes to reflect the emissions unit's potentials to emit. Therefore, it is not necessary to establish monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.

II. Operational Restrictions

1. When coating plastic parts, the permittee shall not employ any coating or cleanup material in this emissions unit for the plastic parts that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

2. When coating metal parts, the permittee shall only employ coatings for the metal parts that comply with the VOC content limitation of 3.5 pounds VOC/gallon of coating, excluding water and exempt solvents.

3. The permittee shall operate the dry filtration system 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 month for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, as a group, for metal parts coating operations:

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

b. the VOC content of each coating employed, in pounds per gallon (excluding water and exempt solvents), as applied.

2. The permittee shall collect and record the following information each month for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, as a group, for plastic parts coating operations:

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

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

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

3. The permittee shall collect and record the following information each day for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, as a group, for coatings and cleanup materials employed (for metal and plastic parts):

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

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

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

d. the VOC emission rate* for each coating and cleanup material employed, in pounds (b x c);

e. the total VOC emissions for all the coatings and cleanup materials employed (summation of d for all coatings and cleanup materials), in pounds; and

f. the rolling, 365-day summation of the daily VOC emission rates, in tons.

* The permittee may calculate the VOC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

VOC emissions from cleanup operations = [total gallons of cleanup material used x solvent density of cleanup material]-[total gallons of cleanup material sent off-site for reclamation/disposal (minus solids content of said material) x solvent density].

4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of noncomplying coatings for metal parts (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of noncomplying coatings or cleanup materials for plastic parts (i.e., photochemically reactive materials). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.

4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 365-day VOC emission limitation of 97 tons (for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, combined). These quarterly deviation reports shall be submitted in accordance with the requirements detailed in Part I, Paragraph A.1.c of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitation:

VOC emissions (from the use of coatings and cleanup materials) for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, combined, shall not exceed 97.0 tons/year, based on a rolling, 365-day summation of the daily VOC input rates

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.3 of this permit.

1.b Emission Limitation:

3.5 pounds VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance with the VOC content limitation above shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

1.c Emission Limitations:

0.54 pound PE/hour, 2.37 tons PE/year

Applicable Compliance Method:

To determine the actual worst-case PE rate (E), the following equation may be used for the paint spraying operations:

E = maximum coating solids usage rate, in pounds/hour x (1-TE) x (1-CE)

where:

E = PE rate (pounds/hour)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (65 percent, per company-supplied data)

CE = control efficiency of the control equipment (assumed to be 95 percent)

The annual allowable PE limitation was developed by multiplying the hourly allowable PE limitation by 8760, and then dividing by 2000. Therefore, provided compliance is shown with the hourly allowable PE limitation, compliance shall also be shown with the annual allowable PE limitation.

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation above pursuant to 40 CFR, Part 60, Appendix A, Methods 1 through 5.

1.d Emission Limitation:

Visible particulate emissions shall not exceed 0 percent opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

V. Testing Requirements (continued)

1.e Emission Limitations:

402.96 pounds VOC/day, 73.54 tons VOC/year (for coatings)

Applicable Compliance Method:

The daily allowable VOC emission limitation was established by determining the highest VOC emissions scenario for any given day. This was done by multiplying the maximum daily usage rate for each coating material (gallons/day) by the VOC content of that coating material (lbs/gallon). The scenario that resulted in the highest VOC emissions equals the daily allowable VOC emission limitation.

The annual allowable VOC emission limitation was developed by multiplying the daily allowable VOC emission limitation by 365, and then dividing by 2000. Therefore, provided compliance is shown with the daily allowable VOC emission limitation, compliance shall also be shown with the annual allowable VOC emission limitation.

1.f Emission Limitations:

181.5 pounds VOC/month, 1.09 tons VOC/year (for cleanup materials)

Applicable Compliance Method:

The monthly allowable VOC emission limitation was established by determining the highest VOC emissions scenario for any given month. This was done by multiplying the maximum monthly usage rate for each cleanup material (gallons/month) by the VOC content of that cleanup material (lbs/gallon). The scenario that resulted in the highest VOC emissions equals the monthly allowable VOC emission limitation.

The annual allowable VOC emission limitation was developed by multiplying the monthly allowable VOC emission limitation by 12, and then dividing by 2000. Therefore, provided compliance is shown with the monthly allowable VOC emission limitation, compliance shall also be shown with the annual allowable VOC emission limitation.

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
steel/plastic parts paint spray booth (paint booth #4), with dry filtration	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Hexamethylene Diisocyanate
TLV (mg/m3): 0.0344
Maximum Hourly Emission Rate (lbs/hr): 0.0020
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.249
MAGLC (ug/m3): 0.8191

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

2.a changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

2.b changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Booth #3 (R010)

Activity Description: Paint Booth #3

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
steel/plastic parts paint spray booth (paint booth #3), with dry filtration	OAC rule 3745-31-05(A)(3) (PTI No. 03-13335)	for the coating of metal and plastic parts: 402.96 pounds volatile organic compounds (VOC)/day, 73.54 tons VOC/year, from the use of coatings 181.5 pounds VOC/month, 1.09 tons VOC/year, from the use of cleanup materials 0.54 pound particulate emissions (PE)/hour, 2.37 tons PE/year Visible PE shall not exceed 0 percent opacity, as a 6-minute average. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c), 3745-31-05(D) and 3745-21-07(G).
	OAC rule 3745-31-05(D) (PTI No. 03-13335)	97.0 tons VOC/rolling, 365-day period (See A.I.2.a.)
	OAC rule 3745-21-09(U)(1)(c)	on any day when coating metal parts, 3.5 pounds VOC/gallon of coating, excluding water and exempt solvents (for extreme performance coatings) for the coatings used for the metal parts
	OAC rule 3745-21-07(G)	On any day when coating non-metal parts, see Section A.II.1.
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-17-07(A)	none (See A.I.2.b.)

2. Additional Terms and Conditions

2.a The permittee has requested the following federally enforceable VOC emission restriction for the purpose of establishing the facility as a minor facility for PSD:

The total VOC emissions (from the use of coatings and cleanup materials) from emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, combined, shall not exceed 97.0 tons/year, based on a rolling, 365-day summation of the daily VOC input rates.

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

2.c The VOC emission limitations of 402.96 lbs/day, 73.54 tons/year, 181.5 lbs/month and 1.09 tons/year were established for PTI purposes to reflect the emissions unit's potentials to emit. Therefore, it is not necessary to establish monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.

II. Operational Restrictions

1. When coating plastic parts, the permittee shall not employ any coating or cleanup material in this emissions unit for the plastic parts that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

2. When coating metal parts, the permittee shall only employ coatings for the metal parts that comply with the VOC content limitation of 3.5 pounds VOC/gallon of coating, excluding water and exempt solvents.

3. The permittee shall operate the dry filtration system 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 month for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, as a group, for metal parts coating operations:

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

b. the VOC content of each coating employed, in pounds per gallon (excluding water and exempt solvents), as applied.

2. The permittee shall collect and record the following information each month for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, as a group, for plastic parts coating operations:

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

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

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

3. The permittee shall collect and record the following information each day for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, as a group, for coatings and cleanup materials employed (for metal and plastic parts):

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

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

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

d. the VOC emission rate* for each coating and cleanup material employed, in pounds (b x c);

e. the total VOC emissions for all the coatings and cleanup materials employed (summation of d for all coatings and cleanup materials), in pounds; and

f. the rolling, 365-day summation of the daily VOC emission rates, in tons.

* The permittee may calculate the VOC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

VOC emissions from cleanup operations = [total gallons of cleanup material used x solvent density of cleanup material]-[total gallons of cleanup material sent off-site for reclamation/disposal (minus solids content of said material) x solvent density].

4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of noncomplying coatings for metal parts (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of noncomplying coatings or cleanup materials for plastic parts (i.e., photochemically reactive materials). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.

4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 365-day VOC emission limitation of 97 tons (for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, combined). These quarterly deviation reports shall be submitted in accordance with the requirements detailed in Part I, Paragraph A.1.c of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitation:

VOC emissions (from the use of coatings and cleanup materials) for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, combined, shall not exceed 97.0 tons/year, based on a rolling, 365-day summation of the daily VOC input rates

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.3 of this permit.

1.b Emission Limitation:

3.5 pounds VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance with the VOC content limitation above shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

1.c Emission Limitations:

0.54 pound PE/hour, 2.37 tons PE/year

Applicable Compliance Method:

To determine the actual worst-case PE rate (E), the following equation may be used for the paint spraying operations:

E = maximum coating solids usage rate, in pounds/hour x (1-TE) x (1-CE)

where:

E = PE rate (pounds/hour)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (65 percent, per company-supplied data)

CE = control efficiency of the control equipment (assumed to be 95 percent)

The annual allowable PE limitation was developed by multiplying the hourly allowable PE limitation by 8760, and then dividing by 2000. Therefore, provided compliance is shown with the hourly allowable PE limitation, compliance shall also be shown with the annual allowable PE limitation.

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation above pursuant to 40 CFR, Part 60, Appendix A, Methods 1 through 5.

1.d Emission Limitation:

Visible particulate emissions shall not exceed 0 percent opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

V. Testing Requirements (continued)

1.e Emission Limitations:

402.96 pounds VOC/day, 73.54 tons VOC/year (for coatings)

Applicable Compliance Method:

The daily allowable VOC emission limitation was established by determining the highest VOC emissions scenario for any given day. This was done by multiplying the maximum daily usage rate for each coating material (gallons/day) by the VOC content of that coating material (lbs/gallon). The scenario that resulted in the highest VOC emissions equals the daily allowable VOC emission limitation.

The annual allowable VOC emission limitation was developed by multiplying the daily allowable VOC emission limitation by 365, and then dividing by 2000. Therefore, provided compliance is shown with the daily allowable VOC emission limitation, compliance shall also be shown with the annual allowable VOC emission limitation.

1.f Emission Limitations:

181.5 pounds VOC/month, 1.09 tons VOC/year (for cleanup materials)

Applicable Compliance Method:

The monthly allowable VOC emission limitation was established by determining the highest VOC emissions scenario for any given month. This was done by multiplying the maximum monthly usage rate for each cleanup material (gallons/month) by the VOC content of that cleanup material (lbs/gallon). The scenario that resulted in the highest VOC emissions equals the monthly allowable VOC emission limitation.

The annual allowable VOC emission limitation was developed by multiplying the monthly allowable VOC emission limitation by 12, and then dividing by 2000. Therefore, provided compliance is shown with the monthly allowable VOC emission limitation, compliance shall also be shown with the annual allowable VOC emission limitation.

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
steel/plastic parts paint spray booth (paint booth #3), with dry filtration	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Hexamethylene Diisocyanate
TLV (mg/m3): 0.0344
Maximum Hourly Emission Rate (lbs/hr): 0.0020
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.249
MAGLC (ug/m3): 0.8191

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

2.a changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

2.b changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Booth #1 (R012)

Activity Description: Paint Booth #1

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
steel/plastic parts paint spray booth (paint booth #1), with dry filtration	OAC rule 3745-31-05(A)(3) (PTI No. 03-13335)	for the coating of metal and plastic parts: 402.96 pounds volatile organic compounds (VOC)/day, 73.54 tons VOC/year, from the use of coatings 181.5 pounds VOC/month, 1.09 tons VOC/year, from the use of cleanup materials 0.54 pound particulate emissions (PE)/hour, 2.37 tons PE/year Visible PE shall not exceed 0 percent opacity, as a 6-minute average. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c), 3745-31-05(D) and 3745-21-07(G).
	OAC rule 3745-31-05(D) (PTI No. 03-13335)	97.0 tons VOC/rolling, 365-day period (See A.I.2.a.)
	OAC rule 3745-21-09(U)(1)(c)	on any day when coating metal parts, 3.5 pounds VOC/gallon of coating, excluding water and exempt solvents (for extreme performance coatings) for the coatings used for the metal parts
	OAC rule 3745-21-07(G)	On any day when coating non-metal parts, see Section A.II.1.
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-17-07(A)	none (See A.I.2.b.)

2. Additional Terms and Conditions

2.a The permittee has requested the following federally enforceable VOC emission restriction for the purpose of establishing the facility as a minor facility for PSD:

The total VOC emissions (from the use of coatings and cleanup materials) from emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, combined, shall not exceed 97.0 tons/year, based on a rolling, 365-day summation of the daily VOC input rates.

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

2.c The VOC emission limitations of 402.96 lbs/day, 73.54 tons/year, 181.5 lbs/month and 1.09 tons/year were established for PTI purposes to reflect the emissions unit's potentials to emit. Therefore, it is not necessary to establish monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.

II. Operational Restrictions

1. When coating plastic parts, the permittee shall not employ any coating or cleanup material in this emissions unit for the plastic parts that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

2. When coating metal parts, the permittee shall only employ coatings for the metal parts that comply with the VOC content limitation of 3.5 pounds VOC/gallon of coating, excluding water and exempt solvents.

3. The permittee shall operate the dry filtration system 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 month for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, as a group, for metal parts coating operations:

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

b. the VOC content of each coating employed, in pounds per gallon (excluding water and exempt solvents), as applied.

2. The permittee shall collect and record the following information each month for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, as a group, for plastic parts coating operations:

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

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

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

3. The permittee shall collect and record the following information each day for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, as a group, for coatings and cleanup materials employed (for metal and plastic parts):

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

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

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

d. the VOC emission rate* for each coating and cleanup material employed, in pounds (b x c);

e. the total VOC emissions for all the coatings and cleanup materials employed (summation of d for all coatings and cleanup materials), in pounds; and

f. the rolling, 365-day summation of the daily VOC emission rates, in tons.

* The permittee may calculate the VOC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

VOC emissions from cleanup operations = [total gallons of cleanup material used x solvent density of cleanup material]-[total gallons of cleanup material sent off-site for reclamation/disposal (minus solids content of said material) x solvent density].

4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of noncomplying coatings for metal parts (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of noncomplying coatings or cleanup materials for plastic parts (i.e., photochemically reactive materials). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.

4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 365-day VOC emission limitation of 97 tons (for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, combined). These quarterly deviation reports shall be submitted in accordance with the requirements detailed in Part I, Paragraph A.1.c of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitation:

VOC emissions (from the use of coatings and cleanup materials) for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, combined, shall not exceed 97.0 tons/year, based on a rolling, 365-day summation of the daily VOC input rates

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.3 of this permit.

1.b Emission Limitation:

3.5 pounds VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance with the VOC content limitation above shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

1.c Emission Limitations:

0.54 pound PE/hour, 2.37 tons PE/year

Applicable Compliance Method:

To determine the actual worst-case PE rate (E), the following equation may be used for the paint spraying operations:

E = maximum coating solids usage rate, in pounds/hour x (1-TE) x (1-CE)

where:

E = PE rate (pounds/hour)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (65 percent, per company-supplied data)

CE = control efficiency of the control equipment (assumed to be 95 percent)

The annual allowable PE limitation was developed by multiplying the hourly allowable PE limitation by 8760, and then dividing by 2000. Therefore, provided compliance is shown with the hourly allowable PE limitation, compliance shall also be shown with the annual allowable PE limitation.

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation above pursuant to 40 CFR, Part 60, Appendix A, Methods 1 through 5.

1.d Emission Limitation:

Visible particulate emissions shall not exceed 0 percent opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

V. Testing Requirements (continued)

1.e Emission Limitations:

402.96 pounds VOC/day, 73.54 tons VOC/year (for coatings)

Applicable Compliance Method:

The daily allowable VOC emission limitation was established by determining the highest VOC emissions scenario for any given day. This was done by multiplying the maximum daily usage rate for each coating material (gallons/day) by the VOC content of that coating material (lbs/gallon). The scenario that resulted in the highest VOC emissions equals the daily allowable VOC emission limitation.

The annual allowable VOC emission limitation was developed by multiplying the daily allowable VOC emission limitation by 365, and then dividing by 2000. Therefore, provided compliance is shown with the daily allowable VOC emission limitation, compliance shall also be shown with the annual allowable VOC emission limitation.

1.f Emission Limitations:

181.5 pounds VOC/month, 1.09 tons VOC/year (for cleanup materials)

Applicable Compliance Method:

The monthly allowable VOC emission limitation was established by determining the highest VOC emissions scenario for any given month. This was done by multiplying the maximum monthly usage rate for each cleanup material (gallons/month) by the VOC content of that cleanup material (lbs/gallon). The scenario that resulted in the highest VOC emissions equals the monthly allowable VOC emission limitation.

The annual allowable VOC emission limitation was developed by multiplying the monthly allowable VOC emission limitation by 12, and then dividing by 2000. Therefore, provided compliance is shown with the monthly allowable VOC emission limitation, compliance shall also be shown with the annual allowable VOC emission limitation.

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
steel/plastic parts paint spray booth (paint booth #1), with dry filtration	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Hexamethylene Diisocyanate
TLV (mg/m3): 0.0344
Maximum Hourly Emission Rate (lbs/hr): 0.0020
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.249
MAGLC (ug/m3): 0.8191

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

2.a changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

2.b changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Booth #9 (R013)

Activity Description: Paint Booth #9

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
steel/plastic parts paint spray booth (paint booth #9), with dry filtration	OAC rule 3745-31-05(A)(3) (PTI No. 03-13335)	for the coating of metal and plastic parts: 402.96 pounds volatile organic compounds (VOC)/day, 73.54 tons VOC/year, from the use of coatings 181.5 pounds VOC/month, 1.09 tons VOC/year, from the use of cleanup materials 0.54 pound particulate emissions (PE)/hour, 2.37 tons PE/year Visible PE shall not exceed 0 percent opacity, as a 6-minute average. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c), 3745-31-05(D) and 3745-21-07(G).
	OAC rule 3745-31-05(D) (PTI No. 03-13335)	97.0 tons VOC/rolling, 365-day period (See A.I.2.a.)
	OAC rule 3745-21-09(U)(1)(c)	on any day when coating metal parts, 3.5 pounds VOC/gallon of coating, excluding water and exempt solvents (for extreme performance coatings) for the coatings used for the metal parts
	OAC rule 3745-21-07(G)	On any day when coating non-metal parts, see Section A.II.1.
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-17-07(A)	none (See A.I.2.b.)

2. Additional Terms and Conditions

2.a The permittee has requested the following federally enforceable VOC emission restriction for the purpose of establishing the facility as a minor facility for PSD:

The total VOC emissions (from the use of coatings and cleanup materials) from emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, combined, shall not exceed 97.0 tons/year, based on a rolling, 365-day summation of the daily VOC input rates.

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

2.c The VOC emission limitations of 402.96 lbs/day, 73.54 tons/year, 181.5 lbs/month and 1.09 tons/year were established for PTI purposes to reflect the emissions unit's potentials to emit. Therefore, it is not necessary to establish monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.

II. Operational Restrictions

1. When coating plastic parts, the permittee shall not employ any coating or cleanup material in this emissions unit for the plastic parts that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

2. When coating metal parts, the permittee shall only employ coatings for the metal parts that comply with the VOC content limitation of 3.5 pounds VOC/gallon of coating, excluding water and exempt solvents.

3. The permittee shall operate the dry filtration system 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 month for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, as a group, for metal parts coating operations:

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

b. the VOC content of each coating employed, in pounds per gallon (excluding water and exempt solvents), as applied.

2. The permittee shall collect and record the following information each month for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, as a group, for plastic parts coating operations:

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

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

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

3. The permittee shall collect and record the following information each day for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, as a group, for coatings and cleanup materials employed (for metal and plastic parts):

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

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

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

d. the VOC emission rate* for each coating and cleanup material employed, in pounds (b x c);

e. the total VOC emissions for all the coatings and cleanup materials employed (summation of d for all coatings and cleanup materials), in pounds; and

f. the rolling, 365-day summation of the daily VOC emission rates, in tons.

* The permittee may calculate the VOC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

VOC emissions from cleanup operations = [total gallons of cleanup material used x solvent density of cleanup material]-[total gallons of cleanup material sent off-site for reclamation/disposal (minus solids content of said material) x solvent density].

4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of noncomplying coatings for metal parts (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of noncomplying coatings or cleanup materials for plastic parts (i.e., photochemically reactive materials). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.

4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 365-day VOC emission limitation of 97 tons (for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, combined). These quarterly deviation reports shall be submitted in accordance with the requirements detailed in Part I, Paragraph A.1.c of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitation:

VOC emissions (from the use of coatings and cleanup materials) for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, combined, shall not exceed 97.0 tons/year, based on a rolling, 365-day summation of the daily VOC input rates

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.3 of this permit.

1.b Emission Limitation:

3.5 pounds VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance with the VOC content limitation above shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

1.c Emission Limitations:

0.54 pound PE/hour, 2.37 tons PE/year

Applicable Compliance Method:

To determine the actual worst-case PE rate (E), the following equation may be used for the paint spraying operations:

E = maximum coating solids usage rate, in pounds/hour x (1-TE) x (1-CE)

where:

E = PE rate (pounds/hour)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (65 percent, per company-supplied data)

CE = control efficiency of the control equipment (assumed to be 95 percent)

The annual allowable PE limitation was developed by multiplying the hourly allowable PE limitation by 8760, and then dividing by 2000. Therefore, provided compliance is shown with the hourly allowable PE limitation, compliance shall also be shown with the annual allowable PE limitation.

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation above pursuant to 40 CFR, Part 60, Appendix A, Methods 1 through 5.

1.d Emission Limitation:

Visible particulate emissions shall not exceed 0 percent opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

V. Testing Requirements (continued)

1.e Emission Limitations:

402.96 pounds VOC/day, 73.54 tons VOC/year (for coatings)

Applicable Compliance Method:

The daily allowable VOC emission limitation was established by determining the highest VOC emissions scenario for any given day. This was done by multiplying the maximum daily usage rate for each coating material (gallons/day) by the VOC content of that coating material (lbs/gallon). The scenario that resulted in the highest VOC emissions equals the daily allowable VOC emission limitation.

The annual allowable VOC emission limitation was developed by multiplying the daily allowable VOC emission limitation by 365, and then dividing by 2000. Therefore, provided compliance is shown with the daily allowable VOC emission limitation, compliance shall also be shown with the annual allowable VOC emission limitation.

1.f Emission Limitations:

181.5 pounds VOC/month, 1.09 tons VOC/year (for cleanup materials)

Applicable Compliance Method:

The monthly allowable VOC emission limitation was established by determining the highest VOC emissions scenario for any given month. This was done by multiplying the maximum monthly usage rate for each cleanup material (gallons/month) by the VOC content of that cleanup material (lbs/gallon). The scenario that resulted in the highest VOC emissions equals the monthly allowable VOC emission limitation.

The annual allowable VOC emission limitation was developed by multiplying the monthly allowable VOC emission limitation by 12, and then dividing by 2000. Therefore, provided compliance is shown with the monthly allowable VOC emission limitation, compliance shall also be shown with the annual allowable VOC emission limitation.

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
steel/plastic parts paint spray booth (paint booth #9), with dry filtration	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Hexamethylene Diisocyanate
TLV (mg/m3): 0.0344
Maximum Hourly Emission Rate (lbs/hr): 0.0020
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.249
MAGLC (ug/m3): 0.8191

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

2.a changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

2.b changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Booth #10 (R014)

Activity Description: Paint Booth #10

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
steel/plastic parts paint spray booth (paint booth #10), with dry filtration	OAC rule 3745-31-05(A)(3) (PTI No. 03-13335)	for the coating of metal and plastic parts: 402.96 pounds volatile organic compounds (VOC)/day, 73.54 tons VOC/year, from the use of coatings 181.5 pounds VOC/month, 1.09 tons VOC/year, from the use of cleanup materials 0.54 pound particulate emissions (PE)/hour, 2.37 tons PE/year Visible PE shall not exceed 0 percent opacity, as a 6-minute average. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c), 3745-31-05(D) and 3745-21-07(G).
	OAC rule 3745-31-05(D) (PTI No. 03-13335)	97.0 tons VOC/rolling, 365-day period (See A.I.2.a.)
	OAC rule 3745-21-09(U)(1)(c)	on any day when coating metal parts, 3.5 pounds VOC/gallon of coating, excluding water and exempt solvents (for extreme performance coatings) for the coatings used for the metal parts
	OAC rule 3745-21-07(G)	On any day when coating non-metal parts, see Section A.II.1.
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-17-07(A)	none (See A.I.2.b.)

2. Additional Terms and Conditions

2.a The permittee has requested the following federally enforceable VOC emission restriction for the purpose of establishing the facility as a minor facility for PSD:

The total VOC emissions (from the use of coatings and cleanup materials) from emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, combined, shall not exceed 97.0 tons/year, based on a rolling, 365-day summation of the daily VOC input rates.

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

2.c The VOC emission limitations of 402.96 lbs/day, 73.54 tons/year, 181.5 lbs/month and 1.09 tons/year were established for PTI purposes to reflect the emissions unit's potentials to emit. Therefore, it is not necessary to establish monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.

II. Operational Restrictions

1. When coating plastic parts, the permittee shall not employ any coating or cleanup material in this emissions unit for the plastic parts that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

2. When coating metal parts, the permittee shall only employ coatings for the metal parts that comply with the VOC content limitation of 3.5 pounds VOC/gallon of coating, excluding water and exempt solvents.

3. The permittee shall operate the dry filtration system 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 month for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, as a group, for metal parts coating operations:

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

b. the VOC content of each coating employed, in pounds per gallon (excluding water and exempt solvents), as applied.

2. The permittee shall collect and record the following information each month for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, as a group, for plastic parts coating operations:

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

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

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

3. The permittee shall collect and record the following information each day for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, as a group, for coatings and cleanup materials employed (for metal and plastic parts):

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

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

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

d. the VOC emission rate* for each coating and cleanup material employed, in pounds (b x c);

e. the total VOC emissions for all the coatings and cleanup materials employed (summation of d for all coatings and cleanup materials), in pounds; and

f. the rolling, 365-day summation of the daily VOC emission rates, in tons.

* The permittee may calculate the VOC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

VOC emissions from cleanup operations = [total gallons of cleanup material used x solvent density of cleanup material]-[total gallons of cleanup material sent off-site for reclamation/disposal (minus solids content of said material) x solvent density].

4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of noncomplying coatings for metal parts (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of noncomplying coatings or cleanup materials for plastic parts (i.e., photochemically reactive materials). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.

4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 365-day VOC emission limitation of 97 tons (for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, combined). These quarterly deviation reports shall be submitted in accordance with the requirements detailed in Part I, Paragraph A.1.c of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitation:

VOC emissions (from the use of coatings and cleanup materials) for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, combined, shall not exceed 97.0 tons/year, based on a rolling, 365-day summation of the daily VOC input rates

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.3 of this permit.

1.b Emission Limitation:

3.5 pounds VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance with the VOC content limitation above shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

1.c Emission Limitations:

0.54 pound PE/hour, 2.37 tons PE/year

Applicable Compliance Method:

To determine the actual worst-case PE rate (E), the following equation may be used for the paint spraying operations:

E = maximum coating solids usage rate, in pounds/hour x (1-TE) x (1-CE)

where:

E = PE rate (pounds/hour)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (65 percent, per company-supplied data)

CE = control efficiency of the control equipment (assumed to be 95 percent)

The annual allowable PE limitation was developed by multiplying the hourly allowable PE limitation by 8760, and then dividing by 2000. Therefore, provided compliance is shown with the hourly allowable PE limitation, compliance shall also be shown with the annual allowable PE limitation.

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation above pursuant to 40 CFR, Part 60, Appendix A, Methods 1 through 5.

1.d Emission Limitation:

Visible particulate emissions shall not exceed 0 percent opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

V. Testing Requirements (continued)

1.e Emission Limitations:

402.96 pounds VOC/day, 73.54 tons VOC/year (for coatings)

Applicable Compliance Method:

The daily allowable VOC emission limitation was established by determining the highest VOC emissions scenario for any given day. This was done by multiplying the maximum daily usage rate for each coating material (gallons/day) by the VOC content of that coating material (lbs/gallon). The scenario that resulted in the highest VOC emissions equals the daily allowable VOC emission limitation.

The annual allowable VOC emission limitation was developed by multiplying the daily allowable VOC emission limitation by 365, and then dividing by 2000. Therefore, provided compliance is shown with the daily allowable VOC emission limitation, compliance shall also be shown with the annual allowable VOC emission limitation.

1.f Emission Limitations:

181.5 pounds VOC/month, 1.09 tons VOC/year (for cleanup materials)

Applicable Compliance Method:

The monthly allowable VOC emission limitation was established by determining the highest VOC emissions scenario for any given month. This was done by multiplying the maximum monthly usage rate for each cleanup material (gallons/month) by the VOC content of that cleanup material (lbs/gallon). The scenario that resulted in the highest VOC emissions equals the monthly allowable VOC emission limitation.

The annual allowable VOC emission limitation was developed by multiplying the monthly allowable VOC emission limitation by 12, and then dividing by 2000. Therefore, provided compliance is shown with the monthly allowable VOC emission limitation, compliance shall also be shown with the annual allowable VOC emission limitation.

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
steel/plastic parts paint spray booth (paint booth #10), with dry filtration	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Hexamethylene Diisocyanate
TLV (mg/m3): 0.0344
Maximum Hourly Emission Rate (lbs/hr): 0.0020
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.249
MAGLC (ug/m3): 0.8191

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

2.a changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

2.b changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Soapline (R015)

Activity Description: Sprays soap solution on parts

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
soapline (with isopropyl alcohol)	OAC rule 3745-21-07(G)	none (See A.II.1.)

2. Additional Terms and Conditions

None

II. Operational Restrictions

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

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the following information each month for this emissions unit:

a. the name and company identification for each liquid organic material employed; and

b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of noncomplying liquid organic materials (i.e., photochemically reactive materials). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

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

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: #1 foam unit in-mold coating booth□□ (R016)

Activity Description: East (or south) unit in-mold spray coating process

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
#1 foam unit in-mold coating booth	OAC rule 3745-31-05(A) (PTI No. 03-2137)	17.3 pounds organic compounds (OC)/hour, for emissions units R016 and R017, combined 52.1 tons OC/year, for emissions units R016 and R017, combined The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11(B), 3745-21-07(G) and 3745-17-07(A).
	OAC rule 3745-21-07(G)	none (See Section A.II.1.)
	OAC rule 3745-17-11(B)	0.551 lb particulate emissions (PE)/hour
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.

2. Additional Terms and Conditions

2.a The OC emission limitation of 17.3 lbs/hour (for emissions units R016 and R017, combined) was established for PTI purposes to reflect the emissions units' potential to emit. Therefore, it is not necessary to establish monitoring, record keeping and/or reporting requirements to ensure compliance with this limitation.

II. Operational Restrictions

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

2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain the following information each month for this emissions unit:

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

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

2. The permittee shall calculate and maintain each month the following information for emissions units R016 and R017, combined:

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

b. the OC content of each coating and cleanup material, as applied, in pounds per gallon;

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

d. the OC emission rate* for each coating and cleanup material, in pounds (b x c); and

e. the total OC emissions from all the coatings and cleanup materials employed (summation of d for all coatings and cleanup materials), in pounds.

* The permittee may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material]) x solvent density

3. The permittee shall calculate and maintain each year the total OC emissions from all the coatings and cleanup materials employed, in pounds, for emissions units R016 and R017, combined (this is the summation of all the monthly OC emission rates (from Section 2.e) for the calendar year).

4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of any noncomplying coating or cleanup material (i.e., photochemically reactive material) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days of the date of the daily record indicating non-compliance.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days after the event occurs.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:

17.3 pounds OC/hour, for emissions units R016 and R017, combined

Applicable Compliance Method:

The hourly allowable OC emission limitation was established by multiplying the maximum hourly coatings usage rate (gallons/hour) by the maximum VOC content of all the coatings used (lbs/gallon).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation in accordance with Methods 1 through 4 and 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

1.b Emission Limitation:

52.1 tons OC/year, for emissions units R016 and R017, combined

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Sections A.III.2 and 3 of this permit.

1.c Emission Limitation:

0.551 lb PE/hour

Applicable Compliance Method:

To determine the actual worst-case PE rate (E), the following equation may be used for the paint spraying operations:

E = maximum coating solids usage rate, in pounds per hour x (1-TE) x (1-CE)

where:

E = PE rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (65% per company-supplied data)

CE = control efficiency of the control equipment (assumed to be 95%)

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation above pursuant to OAC rule 3745-17-03(B)(10).

1.d Emission Limitation:

Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

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

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: #2 foam unit in-mold□□coating booth□□ (R017)

Activity Description: West unit in-mold spray coating process

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
#2 foam unit in-mold coating booth	OAC rule 3745-31-05(A) (PTI No. 03-2137)	17.3 pounds organic compounds (OC)/hour, for emissions units R016 and R017, combined 52.1 tons OC/year, for emissions units R016 and R017, combined The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11(B), 3745-21-07(G) and 3745-17-07(A).
	OAC rule 3745-21-07(G)	none (See Section A.II.1.)
	OAC rule 3745-17-11(B)	0.551 lb particulate emissions (PE)/hour
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as otherwise provided by rule.

2. Additional Terms and Conditions

2.a The OC emission limitation of 17.3 lbs/hour (for emissions units R016 and R017, combined) was established for PTI purposes to reflect the emissions units' potential to emit. Therefore, it is not necessary to establish monitoring, record keeping and/or reporting requirements to ensure compliance with this limitation.

II. Operational Restrictions

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

2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain the following information each month for this emissions unit:

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

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

2. The permittee shall calculate and maintain each month the following information for emissions units R016 and R017, combined:

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

b. the OC content of each coating and cleanup material, as applied, in pounds per gallon;

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

d. the OC emission rate* for each coating and cleanup material, in pounds (b x c); and

e. the total OC emissions from all the coatings and cleanup materials employed (summation of d for all coatings and cleanup materials), in pounds.

* The permittee may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material]) x solvent density

3. The permittee shall calculate and maintain each year the total OC emissions from all the coatings and cleanup materials employed, in pounds, for emissions units R016 and R017, combined (this is the summation of all the monthly OC emission rates (from Section 2.e) for the calendar year).

4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of any noncomplying coating or cleanup material (i.e., photochemically reactive material) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days of the date of the daily record indicating non-compliance.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days after the event occurs.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

V. Testing Requirements (continued)

1.a Emission Limitation:

17.3 pounds OC/hour, for emissions units R016 and R017, combined

Applicable Compliance Method:

The hourly allowable OC emission limitation was established by multiplying the maximum hourly coatings usage rate (gallons/hour) by the maximum VOC content of all the coatings used (lbs/gallon).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation in accordance with Methods 1 through 4 and 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

1.b Emission Limitation:

52.1 tons OC/year, for emissions units R016 and R017, combined

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Sections A.III.2 and 3 of this permit.

1.c Emission Limitation:

0.551 lb PE/hour

Applicable Compliance Method:

To determine the actual worst-case PE rate (E), the following equation may be used for the paint spraying operations:

E = maximum coating solids usage rate, in pounds per hour x (1-TE) x (1-CE)

where:

E = PE rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (65% per company-supplied data)

CE = control efficiency of the control equipment (assumed to be 95%)

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation above pursuant to OAC rule 3745-17-03(B)(10).

1.d Emission Limitation:

Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

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

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: Paint Booth #7 (R018)

Activity Description: Paint Booth #7

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
steel/plastic parts paint spray booth (paint booth #7), with dry filtration	OAC rule 3745-31-05(A)(3) (PTI No. 03-13335)	for the coating of metal and plastic parts: 402.96 pounds volatile organic compounds (VOC)/day, 73.54 tons VOC/year, from the use of coatings 181.5 pounds VOC/month, 1.09 tons VOC/year, from the use of cleanup materials 0.54 pound particulate emissions (PE)/hour, 2.37 tons PE/year Visible PE shall not exceed 0 percent opacity, as a 6-minute average. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c), 3745-31-05(D) and 3745-21-07(G).
	OAC rule 3745-31-05(D) (PTI No. 03-13335)	97.0 tons VOC/rolling, 365-day period (See A.I.2.a.)
	OAC rule 3745-21-09(U)(1)(c)	on any day when coating metal parts, 3.5 pounds VOC/gallon of coating, excluding water and exempt solvents (for extreme performance coatings) for the coatings used for the metal parts
	OAC rule 3745-21-07(G)	On any day when coating non-metal parts, see Section A.II.1.
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-17-07(A)	none (See A.I.2.b.)

2. Additional Terms and Conditions

2.a The permittee has requested the following federally enforceable VOC emission restriction for the purpose of establishing the facility as a minor facility for PSD:

The total VOC emissions (from the use of coatings and cleanup materials) from emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, combined, shall not exceed 97.0 tons/year, based on a rolling, 365-day summation of the daily VOC input rates.

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

2.c The VOC emission limitations of 402.96 lbs/day, 73.54 tons/year, 181.5 lbs/month and 1.09 tons/year were established for PTI purposes to reflect the emissions unit's potentials to emit. Therefore, it is not necessary to establish monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.

II. Operational Restrictions

1. When coating plastic parts, the permittee shall not employ any coating or cleanup material in this emissions unit for the plastic parts that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

2. When coating metal parts, the permittee shall only employ coatings for the metal parts that comply with the VOC content limitation of 3.5 pounds VOC/gallon of coating, excluding water and exempt solvents.

3. The permittee shall operate the dry filtration system 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 month for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, as a group, for metal parts coating operations:

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

b. the VOC content of each coating employed, in pounds per gallon (excluding water and exempt solvents), as applied.

2. The permittee shall collect and record the following information each month for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, as a group, for plastic parts coating operations:

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

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

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

3. The permittee shall collect and record the following information each day for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, as a group, for coatings and cleanup materials employed (for metal and plastic parts):

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

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

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

d. the VOC emission rate* for each coating and cleanup material employed, in pounds (b x c);

e. the total VOC emissions for all the coatings and cleanup materials employed (summation of d for all coatings and cleanup materials), in pounds; and

f. the rolling, 365-day summation of the daily VOC emission rates, in tons.

* The permittee may calculate the VOC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

VOC emissions from cleanup operations = [total gallons of cleanup material used x solvent density of cleanup material]-[total gallons of cleanup material sent off-site for reclamation/disposal (minus solids content of said material) x solvent density].

4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of noncomplying coatings for metal parts (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of noncomplying coatings or cleanup materials for plastic parts (i.e., photochemically reactive materials). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.

4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 365-day VOC emission limitation of 97 tons (for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, combined). These quarterly deviation reports shall be submitted in accordance with the requirements detailed in Part I, Paragraph A.1.c of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitation:

VOC emissions (from the use of coatings and cleanup materials) for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018, combined, shall not exceed 97.0 tons/year, based on a rolling, 365-day summation of the daily VOC input rates

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section A.III.3 of this permit.

1.b Emission Limitation:

3.5 pounds VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance with the VOC content limitation above shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

1.c Emission Limitations:

0.54 pound PE/hour, 2.37 tons PE/year

Applicable Compliance Method:

To determine the actual worst-case PE rate (E), the following equation may be used for the paint spraying operations:

E = maximum coating solids usage rate, in pounds/hour x (1-TE) x (1-CE)

where:

E = PE rate (pounds/hour)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (65 percent, per company-supplied data)

CE = control efficiency of the control equipment (assumed to be 95 percent)

The annual allowable PE limitation was developed by multiplying the hourly allowable PE limitation by 8760, and then dividing by 2000. Therefore, provided compliance is shown with the hourly allowable PE limitation, compliance shall also be shown with the annual allowable PE limitation.

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation above pursuant to 40 CFR, Part 60, Appendix A, Methods 1 through 5.

1.d Emission Limitation:

Visible particulate emissions shall not exceed 0 percent opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

V. Testing Requirements (continued)

1.e Emission Limitations:

402.96 pounds VOC/day, 73.54 tons VOC/year (for coatings)

Applicable Compliance Method:

The daily allowable VOC emission limitation was established by determining the highest VOC emissions scenario for any given day. This was done by multiplying the maximum daily usage rate for each coating material (gallons/day) by the VOC content of that coating material (lbs/gallon). The scenario that resulted in the highest VOC emissions equals the daily allowable VOC emission limitation.

The annual allowable VOC emission limitation was developed by multiplying the daily allowable VOC emission limitation by 365, and then dividing by 2000. Therefore, provided compliance is shown with the daily allowable VOC emission limitation, compliance shall also be shown with the annual allowable VOC emission limitation.

1.f Emission Limitations:

181.5 pounds VOC/month, 1.09 tons VOC/year (for cleanup materials)

Applicable Compliance Method:

The monthly allowable VOC emission limitation was established by determining the highest VOC emissions scenario for any given month. This was done by multiplying the maximum monthly usage rate for each cleanup material (gallons/month) by the VOC content of that cleanup material (lbs/gallon). The scenario that resulted in the highest VOC emissions equals the monthly allowable VOC emission limitation.

The annual allowable VOC emission limitation was developed by multiplying the monthly allowable VOC emission limitation by 12, and then dividing by 2000. Therefore, provided compliance is shown with the monthly allowable VOC emission limitation, compliance shall also be shown with the annual allowable VOC emission limitation.

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
steel/plastic parts paint spray booth (paint booth #7), with dry filtration	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for emissions units R002, R003, R004, R006, R007, R010, R012, R013, R014 and R018 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Hexamethylene Diisocyanate
TLV (mg/m3): 0.0344
Maximum Hourly Emission Rate (lbs/hr): 0.0020
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.249
MAGLC (ug/m3): 0.8191

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

2.a changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

2.b changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: silicon seal coat (R019)

Activity Description: Manufacture and repair silicon seals used in manufacturing

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
silicon seal coat	OAC rule 3745-31-05(A)(3) (PTI No. 03-7445)	The requirements of this rule also include compliance with OAC rules 3745-17-11(B), 3745-17-07(A) and 3745-21-07(G)(2).
	OAC rule 3745-17-11(B)	0.551 lb particulate emissions (PE)/hr
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity as a six-minute average, except as provided by rule.
	OAC rule 3745-21-07(G)(2)	8 lbs organic compounds (OC)/hr, 40 lbs OC/day

2. Additional Terms and Conditions

2.a The 8 pounds OC/hour emission limitation is greater than the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

II. Operational Restrictions

1. The permittee shall operate the dry filtration system 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 cleanup material employed;

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

c. the OC content of each coating and cleanup material, in pounds per gallon;

d. the OC emission rate for each coating and cleanup material, in pounds (b x c); and

e. the total OC emission rate for all the coatings and cleanup materials employed, in pounds (summation of d for all coatings and cleanup materials).

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

The permittee may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal.

OC emissions from cleanup operations = [total gallons of cleanup material used x solvent density of cleanup material]-[total gallons of cleanup material sent off-site for reclamation/disposal (minus solids content of said material) x solvent density].

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

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days after the event occurs.

2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the OC emissions from the coatings and cleanup materials exceeded 40 pounds per day, and the actual OC emissions for each such day. These quarterly deviation reports shall be submitted in accordance with the requirements detailed in Part I, Paragraph A.1.c of this permit.

V. Testing Requirements

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

1.a Emission Limitation:

8 pounds OC/hour

Applicable Compliance Method:

The hourly allowable OC emission limitation was calculated by multiplying the maximum solvent hourly usage rate (1.26 gallons/hour) by the density of the solvent (6.3 pounds OC/gallon). This equals 7.94 pounds OC/hour, which is less than the 8 pounds OC/hour limitation.

1.b Emission Limitation:

40 pounds OC/day

Applicable Compliance Methods:

Compliance shall be determined based upon the record keeping requirements specified in Section A.III.1 of the terms and conditions of this permit.

V. Testing Requirements (continued)

1.c Emission Limitation:

0.551 lb PE/hr

Applicable Compliance Method:

To determine the actual worst case PE rate (E), the following equation may be used for this emissions unit:

E = PE rate (lbs/hr)

E = (maximum coating solids usage rate, in pounds per hour) X (1-TE) X (1-CE)

where:

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation pursuant to OAC rule 3745-17-03(B)(10).

1.d Emisssion Limitation:

Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

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

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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