



State of Ohio Environmental Protection Agency

Street Address:

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

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

Mailing Address:

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

01/21/04

CERTIFIED MAIL

RE: Final Title V Chapter 3745-77 permit

03-72-03-0199
Eaton Inoac Co
Shawn M. Reinhart
1410 Motor Drive
Fremont, OH 43420

Dear Shawn M. Reinhart:

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
309 South Fourth Street, Room 222
Columbus, Ohio 43215

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

Sincerely,

Michael W. Ahern
Permit Issuance and Data Management 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: 01/21/04	Effective Date: 02/11/04	Expiration Date: 02/11/09
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This document constitutes issuance of a Title V permit for Facility ID: 03-72-03-0199 to:
 Eaton Inoac Co
 1410 Motor Drive
 Fremont, OH 43420

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

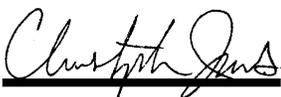
K004 (Paint Line #4) Paint line consisting of paint mixing operation; primer spray booth; primer curing oven; color spray booth; clearcoat spray booth; clearcoat curing oven; and paint cleanup operation.	P018 (Paint Line #3 - Paint Mix Operations) Paint mixing, storage, and clean-up area for Paint Line #3	Parts R011 (Paint Line #3 - Clear Booth) Paint Spray Booth for Coating Plastic Automobile Parts
K005 (Paint Engineering Lab) Spray booth for miscellaneous testing and color matching	P019 (Paint Line #3 - Primer Oven) 1.0 MMBTU/hr Natural Gas Fired Primer Oven for plastic auto parts with flash and cooling zone	R018 (Paint Line #3 - Color Booth) Color Paint Spray Booth for Coating Plastic Automobile Parts
P008 (Paint Line #3 - Clear Oven) Protect Aire Cure Oven for Paint Line #3 with flash zone	P021 (Paint Blending Operation) On-site area for paint suppliers to blend, test, and store various coating formulations.	
	R009 (Paint Line #3 - Primer Booth) Paint Spray Booth for Coating Plastic Automobile	

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, i.e., in Section A.III of Part III of this Title V permit, 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. The permittee shall submit required reports in the following manner:

- i. **All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:**

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with General Term and Condition A.1.c.ii below; and each report shall cover the previous calendar quarter.

In accordance with OAC rule 3745-15-06, a malfunction constitutes a violation of an emission limitation (or control requirement) and, therefore, is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- ii. **Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.IV of Part III of this Title V permit or, in some cases, in Part II of this Title V permit, all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written reports shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. OAC rule 3745-77-07(A)(3)(c) is not fully satisfied until the permittee addresses all other deviations of the federally enforceable requirements specified in the permit.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement overrides the reporting requirements specified in this General Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this General Term and Condition.

See B.6 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- iii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted in the following manner:**

Written reports that identify all other deviations of the federally enforceable requirements contained in this permit, including the monitoring, record keeping, and reporting requirements, which are not reported in accordance with General Term and Condition A.1.c.ii above shall be

submitted to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with General Term and Condition A.1.c.ii above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))
- v. 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))

2. **Scheduled Maintenance**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance 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). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in General Term and Condition A.1.c.i above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. **Risk Management Plans**

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a. a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b. as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management 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. 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.
- 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.

(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))

21. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification by the responsible official of the date on which the emissions unit was permanently shut down. Authorization to operate the affected part or activity of the stationary source shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

If an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent “modification” or “installation” as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an “emissions unit” as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any monitoring, record keeping, reporting, or testing requirements, applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

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 (i) 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, (ii) the probable cause of such deviations, and (iii) 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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 Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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 by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a. where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in General Term and Condition A.1.c.ii;
- b. where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; and
- c. where the company's responsible official has certified that an emissions unit has been permanently shut down.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

1. This facility is subject to 40 CFR, Part 63, Subpart PPPP--National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products (see attached).
2. The following insignificant emissions units are located at this facility:

Cleaver-Brooks 150 hp Boiler (B004);
Paint Line #3 Air Makeup Unit #851 (Z016);
Paint Line #3 Air Makeup Unit #852 (Z017);
Paint Line #3 Air Makeup Unit #853 (Z018);
Paint Line #4 Air Makeup Unit Primer Booth (Z019);
Paint Line #4 Air Makeup Unit Color Booth (Z020);
Paint Line #4 Air Makeup Unit Clear Booth (Z021); and
Blow Mold Natural Gas Material Dryer (Z045).

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, and well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the federally-approved versions of OAC Chapters 3745-17, 3745-18, and/or 3745-21.

B. State Only Enforceable Section

1. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements (as defined in OAC rule 3745-77-01(H)) or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

Binks Oven #79 (P003);
Paint Suppliers Lab (R001);
Design Studio (R004);
Blow Mold #1 (Z001);
Blow Mold #2 (Z002);
Blow Mold #3 (Z003);
Blow Mold #4 (Z004);
Blow Mold #5 (Z005);
Blow Mold #6 (Z006);
Robot Room #1 (Z007);
Robot Room #2 (Z008);
Robot Room #3 (Z009);
Robot Room #4 (Z010);
Post-Op Rework (Z011);
Assembly and Post-Op Rework (Z012);
Paint Line #3 Paint/Waste Storage (Z014);
Propane Vaporizer (Z043);
Post-Op Rework Vacuum System (Z044);
Storage Silo #1 (Z047);
Storage Silo #2 (Z048);
Storage Silo #3 (Z049);
Storage Silo #4 (Z050);
Storage Silo #5 (Z051);
Storage Silo #6 (Z052);
Storage Silo #7 (Z053);
Storage Silo #8 (Z054);
Blow Molding Machines - Robotic Sanders (Z056);
Dual Head Blow Molding Machine (Z059);
Vacuum Pump Blow Mold Pellet Delivery System (Z060);
Paint Engineering Lab Electric Drying Oven (Z062); and
Paint Supplier Lab Booth Electric Drying Oven (Z063).

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Line #4 (K004)

Activity Description: Paint line consisting of paint mixing operation; primer spray booth; primer curing oven; color spray booth; clearcoat spray booth; clearcoat curing oven; and paint cleanup operation.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
paint line #4, equipped with a water curtain system	OAC rule 3745-31-05 (A)(3) (PTI #03-13836)	127.50 lbs organic compounds (OC)/hr, including cleanup materials
		301.2 tons OC/yr, including cleanup materials
		117.00 lbs volatile organic compounds (VOC)/hr, including cleanup materials
		6.10 lbs particulate emissions (PE)/hr 14.5 tons PE/yr
		Visible PE shall not exceed 0% opacity, as a six-minute average.
		See A.I.2.b. and A.I.2.c.
	OAC rule 3745-31-05 (D) (PTI #03-13836)	277.8 tons VOC per rolling, 365-day period (See A.I.2.e.)
	OAC rule 3745-21-07 (G)	See A.II.1.
	OAC rule 3745-21-07 (G)(1)	3 lbs/hr and 15 lbs/day OC emissions (See A.I.2.e.)
	OAC rule 3745-17-07 (A)	See A.I.2.f.
OAC rule 3745-17-10 (B)	0.020 lb PE/mmBtu of actual heat input (from the ovens associated with this emissions unit)	
OAC rule 3745-17-11 (B)	See A.I.2.f.	
OAC rules 3745-21-08(B) and 3745-23-06(B)	See A.I.2.h.	

2. Additional Terms and Conditions

- 2.a** This emissions unit consists of the following operations:
- a. paint mixing operation;
 - b. primer spray booth with water curtain;
 - c. indirect-fired primer curing oven;
 - d. color spray booth with water curtain;
 - e. clearcoat spray booth with water curtain;
 - f. indirect-fired clearcoat curing oven; and
 - g. paint cleanup operation.
- 2.b** The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05 (D), 3745-21-07(G) [for the coating operations], 3745-21-07(G)(1) [for the ovens associated with this emissions unit], 3745-21-08(B), 3745-23-06(B) and 3745-17-10 (B).
- 2.c** All PE are assumed to be particulate matter less than 10 microns in size (PM10).
- 2.d** The permittee has requested a federally enforceable emission limitation for this emissions unit of 277.8 tons VOC per rolling, 365-day period for purposes of avoiding Prevention of Significant Deterioration (PSD) applicability. This emissions unit (paint Line #4) is an existing operation and, as such, has existing records of VOC emissions in lieu of establishing monthly VOC emission restrictions for the first year of operation.
- 2.e** Based on previous stack testing, it has been determined that each cure oven contributes less than 0.625 pound OC/hour to an overall hourly emission rate of 127.50 pounds for the entire paint line #4. Based on the maximum potential hourly contribution of each cure oven to the overall hourly emission rate, each cure oven is in compliance with the 3 pounds OC/hour and 15 pounds OC/day emission limitations specified in OAC rule 3745-21-07 (G)(1). Therefore, it is not necessary to establish monitoring, record keeping and reporting requirements to ensure compliance with the 3 lbs/hr and 15 lbs/day of OC emissions for the ovens.
- 2.f** 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.g** There are no sulfur dioxide emission limitations established by OAC Chapter 3745-18 for this emissions unit because natural gas is the only fuel burned in this emissions unit.
- 2.h** The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 03-13836.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

II. Operational Restrictions

1. The use of any photochemically reactive material in this emissions unit, as defined in OAC rule 3745-21-01 (C)(5), is prohibited.

II. Operational Restrictions (continued)

2. The permittee shall operate the water curtain system(s) whenever the paint booth(s) associated with this emissions unit is/are in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. The company identification for each liquid organic material employed.
 - b. Documentation on whether or not each liquid organic material employed is a photochemically reactive material.
2. The permittee shall maintain daily records that document any time periods when the water curtain system(s) was/were not in service when the paint booth(s) associated with this emissions unit was/were in operation.
3. The permittee shall collect and record the following information for each day for OC and VOC emissions for this emissions unit:
 - 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 VOC and OC contents of each coating and cleanup material employed, in pounds per gallon.
 - d. The VOC and OC emission rates for all the coatings and cleanup materials employed, in pounds [summation of (b x c) for all coatings and cleanup materials].
 - e. The total number of hours the emissions unit was in operation.
 - f. The average, hourly VOC and OC emission rates for all the coatings and cleanup materials (d/e), in pounds per hour (average).
 - g. The annual, year-to-date OC emission rate, in tons, for all the coatings and cleanup materials (summation of A.III.3.d for OC for each calendar day to date from January to December, divided by 2000).
 - h. The annual emissions of VOC, in tons, based on a rolling, 365-day summation of the daily VOC emission rates.

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

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

4. The permittee shall collect and record the following information for each day for this emissions unit:
- The company identification for each coating employed.
 - The number of gallons of each coating employed.
 - The solids content of each coating employed, in pounds per gallon.
 - The total coating solids usage rate for all the coatings employed, in pounds [summation of (b x c) for all coatings].
 - The PE rate for all the coatings employed, in pounds, calculated as follows:

$E = \text{PE rate (lbs/day)}$

$E = (\text{coating solid usage rate [from section A.III.4.d.]}) \times (1 - \text{TE}) \times (1 - \text{CE})$

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 (assumed to be 15 percent or as supported by the most recent facility test data)

CE = control efficiency of the control equipment (assumed to be 90 percent)

- The total number of hours the emissions unit was in operation.
- The average hourly PE rate for all the coatings employed (e/f), in pounds per hour (average).
- The annual, year-to-date PE rate, in tons, for all the coatings employed (summation of A.III.4.e for each calendar day to date from January to December).

IV. Reporting Requirements

- The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of any 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 or local air agency) within 30 days after the exceedance occurs.
- The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water curtain system(s) was/were not in service when the paint booth(s) associated with this emissions unit was/were in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
- The permittee shall submit quarterly deviation (excursion) reports, in accordance with paragraph A.I.c. of the Part 1 - General Terms and Conditions of this permit, that identify each day during which the following average hourly emission limitations were exceeded:
 - 127.50 pounds OC;
 - 117.00 pounds VOC; and/or
 - 6.10 pounds PE.

The permittee shall include in the report the actual average hourly emissions for each such day.

IV. Reporting Requirements (continued)

4. The permittee shall submit annual reports that summarize the actual annual PE and VOC and OC emissions for this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
5. The permittee shall submit quarterly deviation (excursion) reports, in accordance with paragraph A.I.c. of the Part 1 - General Terms and Conditions of this permit, that identify all exceedances of the rolling, 365-day VOC emission limitation of 277.8 tons.

V. Testing Requirements

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

- 1.a Emission Limitations:
127.50 lbs OC/hr and 301.2 tons OC/yr

Applicable Compliance Method:

The record keeping requirements established pursuant to Section A.III.3 of this permit shall be used to determine compliance with the hourly and annual OC emission limitations above.

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

- 1.b Emission Limitations:
6.10 lbs PE/hr and 14.5 tons PE/yr

Applicable Compliance Method:

The record keeping requirements established pursuant to Section A.III.4 of this permit shall be used to determine compliance with the hourly and annual PE limitations above.

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation in accordance with 40 CFR, Part 60, Appendix A, Methods 1-5.

- 1.c Emission Limitation:
Visible PE shall not exceed 0% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance with the visible emission limitation above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60.

- 1.d Emission Limitations:
117.00 lbs VOC/hr and 277.8 tons VOC per rolling, 365-day period

Applicable Compliance Method:

The record keeping requirements established pursuant to Section A.III.3 of this permit shall be used to determine compliance with the hourly and annual VOC emission limitations above.

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

V. Testing Requirements (continued)

- 1.e** Emission Limitation:
0.020 lb PE/mmBtu of actual heat input

Applicable Compliance Method:

The permittee may demonstrate compliance with the PE limitation above by multiplying the maximum hourly natural gas consumption rate (mm cu. ft/hr) by the emission factor, from AP-42, Table 1.4-2 (revised 7/98), of 1.9 lbs PE (filterable)/mm cu. ft, and then dividing by the maximum heat input capacity of the emissions unit (mmBtu/hr)

If required, compliance with this emission limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03 (B)(9).

- 1.f** Emission Limitations:
3 lbs/hr and 15 lbs/day OC (for the ovens associated with this emissions unit)

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly OC emission limitation based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

The permittee may demonstrate compliance with the daily OC emission limitation by multiplying the hourly tested OC emission limitation by 24.

- 2.** The permittee shall conduct, or have conducted, emission testing for the ovens associated with this emissions unit in accordance with the following requirements:
- The emission testing shall be conducted within 6 months after permit issuance. Future emission testing shall be conducted in accordance with the frequencies specified in Engineering Guide #16.
 - The emission testing shall be conducted to demonstrate compliance with the allowable OC mass emission rates of 3 lbs/hr and 15 lbs/day.
 - Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A shall be employed to demonstrate compliance with the allowable mass emission rate for OC. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - The test(s) shall be conducted while this emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Northwest District Office.
- 3.** Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions units operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Northwest District Office's refusal to accept the results of the emission test(s).

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

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

Facility Name: **Eaton Inoac Company**
Facility ID: **03-72-03-0199**
Emissions Unit: **Paint Line #4 (K004)**

V. Testing Requirements (continued)

4. Formulation data or USEPA Method 24 shall be used to determine the OC/VOC contents of 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
paint line #4, equipped with a water curtain system	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 dispersion model. The predicted 1-hour maximum ground-level concentrations from the use of the ISCST3 dispersion model was compared to the Maximum Acceptable Ground-Level Concentrations (MAGLC). The following table summarizes the results of the modeling for the "worst case" pollutant(s):

Air Toxic: Ethylbenzene
TLV (mg/m3): 434.73
MAGLC (ug/m3): 10337.91
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Styrene
TLV (mg/m3): 85.20
MAGLC (ug/m3): 2028.63
Maximum 1-Hour Average Concentration (ug/m3): 1.66

Air Toxic: Methyl Propyl Ketone
TLV (mg/m3): 704.87
MAGLC (ug/m3): 16782.55
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Methyl Isobutyl Ketone
TLV (mg/m3): 204.83
MAGLC (ug/m3): 4876.81
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Mesithylene
TLV (mg/m3): 122.89
MAGLC (ug/m3): 2926.04
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Diisobutyl Ketone
TLV (mg/m3): 145.43
MAGLC (ug/m3): 3462.61
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Toluene
TLV (mg/m3): 188.40
MAGLC (ug/m3): 4485.83
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Ketoheptamethylene (Cyclohexanone)
TLV (mg/m3): 96.30
MAGLC (ug/m3): 2292.82
Maximum 1-Hour Average Concentration (ug/m3): 126.90

Air Toxic: Isobutyl Acetate
TLV (mg/m3): 712.64
MAGLC (ug/m3): 16967.57
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

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

Air Toxic: Methyl Amyl Ketone
TLV (mg/m3): 233.50
MAGLC (ug/m3): 5559.45
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: n-Butyl Acetate
TLV (mg/m3): 712.64
MAGLC (ug/m3): 16967.57
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Isoamyl Acetate
TLV (mg/m3): 266.26
MAGLC (ug/m3): 6339.47
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Xylene
TLV (mg/m3): 434.19
MAGLC (ug/m3): 10337.91
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Ethyl Acetate
TLV (mg/m3): 1441.31
MAGLC (ug/m3): 34316.88
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: n-Heptane
TLV (mg/m3): 1639.26
MAGLC (ug/m3): 39030.09
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Trimethylbenzene
TLV (mg/m3): 122.89
MAGLC (ug/m3): 2926.04
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: n-Amyl Acetate
TLV (mg/m3): 266.26
MAGLC (ug/m3): 6339.47
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Ethyl Alcohol
TLV (mg/m3): 1884.25
MAGLC (ug/m3): 44863.18
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Methyl Alcohol
TLV (mg/m3): 262.09
MAGLC (ug/m3): 6240.14
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Isopropyl Alcohol
TLV (mg/m3): 983.07
MAGLC (ug/m3): 23406.37
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Facility Name: **Eaton Inoac Company**
Facility ID: **03-72-03-0199**
Emissions Unit: **Paint Line #4 (K004)**

Air Toxic: n-Butyl Alcohol
TLV (mg/m3): 151.57
MAGLC (ug/m3): 3608.92
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Isobutyl Alcohol
TLV (mg/m3): 151.57
MAGLC (ug/m3): 3608.92
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Methyl Ethyl Ketone
TLV (mg/m3): 589.78
MAGLC (ug/m3): 14042.26
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Stoddard Solvent
TLV (mg/m3): 572.60
MAGLC (ug/m3): 13633.27
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Hexamethylene Diisocyanate
TLV (mg/m3): 0.03
MAGLC (ug/m3): 0.82
Maximum 1-Hour Average Concentration (ug/m3): 0.81

Air Toxic: 1,2,4-Trimethylbenzene
TLV (mg/m3): 122.89
MAGLC (ug/m3): 2926.04
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Isopropylbenzene
TLV (mg/m3): 245.79
MAGLC (ug/m3): 5852.08
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

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

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

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

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Engineering Lab (K005)
Activity Description: Spray booth for miscellaneous testing and color matching

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
paint engineering lab, equipped with a dry filtration system	OAC rule 3745-31-05 (A)(3) (PTI #03-13836)	26.40 lbs organic compounds (OC)/day, including cleanup materials
		3.4 tons OC/yr, including cleanup materials
		23.52 lbs volatile organic compounds (VOC)/day, including cleanup materials
		0.04 lb particulate emissions (PE)/hr 0.1 ton PE/yr
		Visible PE shall not exceed 0% opacity, as a six-minute average.
		See A.I.2.a and A.I.2.b.
	OAC rule 3745-31-05 (D) (PTI #03-13836)	3.1 tons VOC per rolling, 365-day period (See A.I.2.c.)
	OAC rule 3745-21-07 (G)	See A.II.1.
OAC rule 3745-17-07 (A)	See A.I.2.d.	
OAC rule 3745-17-11 (B)	See A.I.2.d.	

2. Additional Terms and Conditions

- 2.a** The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05 (D) and 3745-21-07(G).
- 2.b** All PE are assumed to be particulate matter less than 10 microns in size (PM10).
- 2.c** The permittee has requested a federally enforceable emission limitation for the paint blending operation of 3.1 tons VOC per rolling, 365-day period for purposes of avoiding Prevention of Significant Deterioration (PSD) applicability.

2. Additional Terms and Conditions (continued)

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

II. Operational Restrictions

1. The use of any photochemically reactive material in this emissions unit, as defined in OAC rule 3745-21-01 (C)(5), is prohibited.
2. The permittee shall operate the dry filtration system whenever the unit is in operation.
3. The annual VOC emissions for this emissions unit shall not exceed 3.1 tons based upon a rolling, 365-day summation of the daily VOC emission rates.

To ensure federal enforceability during the first 365-calendar days of operation after issuance of PTI #03-13836, the permittee shall not exceed the following VOC emission rates:

Month(s)	VOC Emissions
1-1	0.3
1-2	0.6
1-3	0.9
1-4	1.2
1-5	1.5
1-6	1.8
1-7	2.1
1-8	2.3
1-9	2.5
1-10	2.7
1-11	2.9
1-12	3.1

After the first 12 calendar months of operation after issuance of PTI #03-13836, compliance with the annual VOC emission limitation of 3.1 tons shall be based upon a rolling, 365-day summation of the daily VOC emission rates.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. The company identification for each liquid organic material employed.
 - b. Documentation on whether or not each liquid organic material employed is a photochemically reactive material.
2. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when this emission unit was in operation.

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

3. The permittee shall collect and record the following information for each day for OC and VOC emissions for this emissions unit:
- 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 VOC and OC contents of each coating and cleanup material employed, in pounds per gallon.
 - d. The VOC and OC emission rates for all the coatings and cleanup materials employed, in pounds [summation of (b x c), for all coatings and cleanup materials].
 - e. The annual, year-to-date OC emission rate, in tons, for all the coatings and cleanup materials (summation of A.III.3.d for OC for each calendar day to date from January to December, divided by 2000).
 - f. After the first 12 calendar months of operation after issuance of PTI #03-13836, the annual emissions of VOC, in tons, based on a rolling, 365-day summation of the daily VOC emission rates.

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

4. The permittee shall collect and record the following information for each day for this emissions unit:
- a. The company identification for each coating employed.
 - b. The number of gallons of each coating employed.
 - c. The solids content of each coating employed, in pounds per gallon.
 - d. The total coating solids usage rate for all the coatings employed, in pounds [summation of (b x c) for all coatings].
 - e. The PE rate for all the coatings employed, in pounds, calculated as follows:
$$E = \text{PE rate (lbs/day)}$$
$$E = (\text{coating solid usage rate [from section A.III.4.d.]}) \times (1 - \text{TE}) \times (1 - \text{CE})$$
where,
$$\text{TE} = \text{transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (assumed to be 15 percent or as supported by the most recent facility test data)}$$
$$\text{CE} = \text{control efficiency of the control equipment (assumed to be 90 percent)}$$
 - f. The total number of hours the emissions unit was in operation.
 - g. The average hourly PE rate for all the coatings employed (e/f), in pounds per hour (average).
 - h. The annual, year-to-date PE rate, in tons, for all the coatings employed (summation of A.III.4.e for each calendar day to date from January to December).

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

5. For the first 12 calendar months of operation after issuance of PTI #03-13836, the permittee shall collect and record the following information for each month for the VOC emissions for this emissions unit:
 - a. The VOC emission rates for all the coatings and cleanup materials employed, in pounds [calculated by summing the daily VOC emission rates, from section A.III.3.d above, for the calendar month].
 - b. The monthly accumulative VOC emissions, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of any 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 or local air agency) within 30 days after the exceedance occurs.
2. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when this emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
3. The permittee shall submit deviation (excursion) reports, in accordance with paragraph A.I.c. of the Part 1 - General Terms and Conditions of this permit, that identify all exceedances of the following:
 - a. the daily OC emission limitation of 26.40 pounds;
 - b. the daily VOC emission limitation of 23.52 pounds; and/or
 - c. the hourly average PE limitation of 0.04 pound.

The permittee shall include in the report the actual emissions for each such day or hour.

4. The permittee shall submit annual reports that summarize the actual annual PE and VOC and OC emissions for this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
5. For the first 12 calendar months of operation after issuance of PTI #03-13836, the permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, that identify all exceedances of the maximum allowable VOC emission rates specified in Section A.II.3 of this permit.
6. After the first 12 calendar months of operation after issuance of PTI #03-13836, the permittee shall submit deviation (excursion) reports, in accordance with paragraph A.I.c. of the Part 1 - General Terms and Conditions of this permit, that identify all exceedances of the rolling, 365-day VOC emission limitation of 3.1 tons.

V. Testing Requirements

1. Compliance with the emission limitations specified in Section A.I.of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - 1.a Emission Limitations:
26.40 lbs OC/day and 3.4 tons OC/yr

Applicable Compliance Method:

The record keeping requirements established pursuant to Section A.III.3 of this permit shall be used to determine compliance with the daily and annual OC emission limitations above.

V. Testing Requirements (continued)

- 1.b** Emission Limitations:
23.52 lb VOC/hr and 3.1 tons VOC per rolling, 365-day period

Applicable Compliance Method:

The record keeping requirements established pursuant to Section A.III.3 of this permit shall be used to determine compliance with the hourly and annual VOC emission limitations above.

- 1.c** Emission Limitations:
0.04 lb PE/hr and 0.1 ton PE/yr

Applicable Compliance Method:

The record keeping requirements established pursuant to Section A.III.4 of this permit shall be used to determine compliance with the hourly and annual PE limitations above.

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation in accordance with 40 CFR, Part 60, Appendix A, Methods 1-5.

- 1.d** Emission Limitation:
Visible PE shall not exceed 0% opacity, as a six-minute average.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60.

- 1.e** Emission Limitation:
for the first 12-calendar months of operation, the monthly accumulative VOC emission rates

Applicable Compliance Method:

The record keeping requirements established pursuant to Sections A.III.3 and 5 of this permit shall be used to determine compliance with the VOC emission limitations above.

- 2.** Formulation data or USEPA Method 24 shall be used to determine the OC/VOC contents of 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
paint engineering lab, equipped with a dry filtration system	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 dispersion model. The predicted 1-hour maximum ground-level concentrations from the use of the ISCST3 dispersion model was compared to the Maximum Acceptable Ground-Level Concentrations (MAGLC). The following table summarizes the results of the modeling for the "worst case" pollutant(s):

Air Toxic: Ethylbenzene
TLV (mg/m3): 434.73
MAGLC (ug/m3): 10337.91
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Styrene
TLV (mg/m3): 85.20
MAGLC (ug/m3): 2028.63
Maximum 1-Hour Average Concentration (ug/m3): 1.66

Air Toxic: Methyl Propyl Ketone
TLV (mg/m3): 704.87
MAGLC (ug/m3): 16782.55
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Methyl Isobutyl Ketone
TLV (mg/m3): 204.83
MAGLC (ug/m3): 4876.81
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Mesithylene
TLV (mg/m3): 122.89
MAGLC (ug/m3): 2926.04
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Diisobutyl Ketone
TLV (mg/m3): 145.43
MAGLC (ug/m3): 3462.61
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Toluene
TLV (mg/m3): 188.40
MAGLC (ug/m3): 4485.83
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Ketoheptamethylene (Cyclohexanone)
TLV (mg/m3): 96.30
MAGLC (ug/m3): 2292.82
Maximum 1-Hour Average Concentration (ug/m3): 126.90

Air Toxic: Isobutyl Acetate
TLV (mg/m3): 712.64
MAGLC (ug/m3): 16967.57
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

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

Air Toxic: Methyl Amyl Ketone
TLV (mg/m3): 233.50
MAGLC (ug/m3): 5559.45
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: n-Butyl Acetate
TLV (mg/m3): 712.64
MAGLC (ug/m3): 16967.57
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Isoamyl Acetate
TLV (mg/m3): 266.26
MAGLC (ug/m3): 6339.47
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Xylene
TLV (mg/m3): 434.19
MAGLC (ug/m3): 10337.91
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Ethyl Acetate
TLV (mg/m3): 1441.31
MAGLC (ug/m3): 34316.88
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: n-Heptane
TLV (mg/m3): 1639.26
MAGLC (ug/m3): 39030.09
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Trimethylbenzene
TLV (mg/m3): 122.89
MAGLC (ug/m3): 2926.04
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: n-Amyl Acetate
TLV (mg/m3): 266.26
MAGLC (ug/m3): 6339.47
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Ethyl Alcohol
TLV (mg/m3): 1884.25
MAGLC (ug/m3): 44863.18
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Methyl Alcohol
TLV (mg/m3): 262.09
MAGLC (ug/m3): 6240.14
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Isopropyl Alcohol
TLV (mg/m3): 983.07
MAGLC (ug/m3): 23406.37
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: n-Butyl Alcohol
TLV (mg/m3): 151.57
MAGLC (ug/m3): 3608.92
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Isobutyl Alcohol
TLV (mg/m3): 151.57
MAGLC (ug/m3): 3608.92
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Methyl Ethyl Ketone
TLV (mg/m3): 589.78
MAGLC (ug/m3): 14042.26
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Stoddard Solvent
TLV (mg/m3): 572.60
MAGLC (ug/m3): 13633.27
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Hexamethylene Diisocyanate
TLV (mg/m3): 0.03
MAGLC (ug/m3): 0.82
Maximum 1-Hour Average Concentration (ug/m3): 0.81

Air Toxic: 1,2,4-Trimethylbenzene
TLV (mg/m3): 122.89
MAGLC (ug/m3): 2926.04
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Isopropylbenzene
TLV (mg/m3): 245.79
MAGLC (ug/m3): 5852.08
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

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

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

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

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Line #3 - Clear Oven (P008)
Activity Description: Protect Aire Cure Oven for Paint Line #3 with flash zone

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
clear cure oven, equipped with a regenerative thermal oxidizer (RTO); paint line #3	OAC rule 3745-31-05 (A)(3) (PTI #03-10891)	0.38 lb organic compounds (OC)/hr 1.51 tons OC/yr
		combustion emissions from the RTO: 0.62 lb nitrogen oxides (NOx)/hr 2.73 tons NOx/yr (see A.I.2.a)
		combustion emissions from the oven: 0.57 lb NOx/hr 2.29 tons NOx/yr
		See A.I.2.b. and A.I.2.c.
	OAC rule 3745-21-07 (G)(1)	See A.I.2.d.
	OAC rules 3745-21-08 (B) and 3745-23-06 (B)	See A.I.2.f.
	OAC rule 3745-17-10 (B)	0.020 lb particulate emissions (PE)/mmBtu of actual heat input
	OAC rule 3745-17-07 (A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

2. Additional Terms and Conditions

- 2.a Emissions units R009, R011, R018, P008, P018 and P019 are vented to a common RTO. The emission limitations of 0.62 pound NOx/hour and 2.73 tons NOx/year represent the total allowable emissions from the RTO for all these emissions units, combined.
- 2.b Best available technology (BAT) for this emissions unit shall be the use of a RTO with a 100 percent capture efficiency and a minimum 90 percent destruction efficiency for OC, by weight.

2. Additional Terms and Conditions (continued)

- 2.c** The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-08 (B), 3745-23-06 (B), 3745-17-10 (B) and 3745-17-07 (A).
- 2.d** The emission limits/control requirements specified by this rule are less stringent than the emission limits/control requirements established pursuant to OAC rule 3745-31-05 (A)(3).
- 2.e** For purposes of calculating the OC emission rates for this emissions unit and the associated spray booth (R011), the permittee shall utilize a value of 80 percent as the maximum percentage of the OCs employed in the spray booth that are emitted uncontrolled from the spray booth. The remaining 20 percent of the OCs employed in the spray booth shall be considered to be the uncontrolled emissions for this emissions unit. This "split" of OC emissions between this emissions unit and the associated spray booth is based upon best engineering judgement.
- 2.f** The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 03-10891.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.g** There are no sulfur dioxide emission limitations established by OAC Chapter 3745-18 for this emissions unit because natural gas is the only fuel burned in this emissions unit.

II. Operational Restrictions

- 1.** The emissions unit shall be equipped with a permanent total enclosure (PTE) which shall be installed and operated in accordance with 40 CFR Part 51, Appendix M, Method 204. The PTE shall meet the following criteria:
- a. any natural draft opening (NDO) shall be at least 4 equivalent opening diameters from each OC emitting point unless otherwise specified by the Administrator;
 - b. the total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's 4 walls, floor, and ceiling;
 - c. the average facial velocity (FV) of air through all NDO's shall be at least 3,600 m/hr (200 fpm). The direction of air flow through all NDO's shall be into the enclosure;
 - d. all access doors and windows whose areas are not included in section (b) and are not included in the calculation in section (c) shall be closed during routine operation of the process; and
 - e. all OC the emissions must be captured and contained for discharge through a control device.
- 2.** The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as a 3-hour average, whenever this emissions unit is in operation.
- 3.** The average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
- 4.** The annual number of hours of operation for this emissions unit shall not exceed 8,030.

III. Monitoring and/or Record Keeping Requirements

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

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

- a. a log of the downtime for the capture (collection) system, control device and monitoring equipment, when the associated emissions unit was in operation; and
 - b. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated that the emissions unit was in compliance.
2. The permittee shall maintain and operate monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

The permittee shall maintain records of all 3-hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential of 0.007 inch of water, as a 3-hour average.

3. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the total potential uncontrolled OC emissions for the spray booth associated with this emissions unit (Section A.III.4.d of emissions unit R011), in pounds;
 - b. the total potential OC emission rate, in pounds, calculated by multiplying A.III.3.a by the maximum percentage of the emissions associated with this emissions unit (as defined in Section A.I.2.d. of this permit), in pounds;
 - c. the total controlled OC emission rate, in pounds, calculated by multiplying A.III.3.b by (1 - the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance); and
 - d. the number of hours the emissions unit was operation;
 - e. the average hourly controlled OC emission rate, i.e., (c)/(d), in pounds per hour (average).
4. The permittee shall collect and record each year the following information for this emissions unit:
 - a. the total controlled OC emission rate, in tons, calculated by summing the daily OC emission rates, from Section A.III.3.c, for the calendar year, and dividing by 2000; and
 - b. the total number of hours the emissions unit was in operation, calculated by summing the daily numbers of hours of operation, from Section A.III.3.d, for the calendar year.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions units were in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated that the emissions unit was in compliance; and
 - b. all exceedances of the hourly OC emission limitation of 0.38 pound.
2. The permittee shall submit quarterly pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified above.
3. The quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
4. The permittee shall submit annual reports that specify the total actual OC emissions and the total actual number of hours of operation for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
5. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device and monitoring equipment, when the associated emissions unit was in operation.

V. Testing Requirements

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

- 1.a Emission Limitations:
0.38 lb OC/hr and 1.51 tons OC/yr

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation shall be determined by emission testing conducted in accordance with Methods 18, 25, or 25 A, as appropriate, of 40 CFR, Part 60, Appendix A and also the record keeping requirements established in Section A.III.3 of this permit.

Compliance with the annual limitation shall be determined by the record keeping requirements established in Sections A.III.3 and A.III.4 of this permit.

- 1.b Emission Limitations:
0.62 lb NO_x/hr and 2.73 TPY NO_x, from the RTO

Applicable Compliance Method:

Compliance with the hourly emission limitation may be determined by multiplying the maximum rated capacity of the RTO (6.54 mmBtu/hr) by the emission factor in AP-42, Chapter 1.4 (revised 7/98) of 100 lbs NO_x/mm cu. ft. of natural gas, and then dividing by 1020 mmBtu/mm cu. ft. of natural gas.

If required, compliance shall be determined in accordance with Methods 1 - 4 and 7 of 40 CFR, Part 60, Appendix A.

The annual emission limitation was established by multiplying the hourly NO_x limitation by 8,760 hours/year, and then dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

V. Testing Requirements (continued)

- 1.c** Emission Limitations:
0.57 lb NOx/hr and 2.29 tons NOx/yr, from the oven

Applicable Compliance Method:

Compliance with the hourly emission limitation may be determined by multiplying the maximum rated capacity of the oven (6.0 mmBtu/hr) by the emission factor in AP-42, Chapter 1.4 (revised 7/98) of 100 lbs NOx/mm cu. ft. of natural gas, and then dividing by 1020 mmBtu/mm cu. ft. of natural gas.

If required, compliance shall be determined in accordance with Methods 1 - 4 and 7 of 40 CFR, Part 60, Appendix A.

The annual NOx emission limitation was established by multiplying the hourly NOx emission limitation by 8030 hours/year, and then dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly emission limitation and with the restriction on the annual number of hours of operation, compliance shall also be shown with the annual emission limitation.

- 1.d** Emissions Limitation:
100% capture and 90% destruction efficiencies, by weight, for OC

Applicable Compliance Method:

Compliance with the efficiency requirements above shall be determined based upon the results of emission testing conducted in accordance with the methods outlined in Section A.V.2. of this permit.

- 1.e** Emission Limitation:
8,030 hours of operation/yr

Applicable Compliance Method:

Compliance with the annual restriction on the number of hours of operation shall be determined by the record keeping requirements specified in Sections A.III.3. and A.III.4. of this permit.

- 2.** The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within 6 months after permit issuance. Future emission testing shall be conducted in accordance with the frequencies specified in Engineering Guide #16.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable hourly OC mass emission rate and the capture and control efficiency requirements for OC.
 - c. Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A shall be employed to demonstrate compliance with the allowable mass emission rate for OC. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted while emissions units R009, R011, R018, P008, P018 and P019 are operating at their maximum capacities, unless otherwise specified or approved by the Ohio EPA, Northwest District Office.

V. Testing Requirements (continued)

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

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

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

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
clear cure oven, equipped with a regenerative thermal oxidizer (RTO); paint line #3	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the BREEZE AIR ISCST3, v. 2.03 model. The predicted 1-hour maximum ground-level concentration from the use of the BREEZE AIR ISCST3, v. 2.03 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):

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

Pollutant: ethyl benzene
TLV (ug/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 0.37
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 43.7
MAGLC (ug/m3): 10,333.00

Pollutant: methyl ethyl ketone
TLV (ug/m3): 590
Maximum Hourly Emission Rate (lbs/hr): 2.54
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 43.7
MAGLC (ug/m3): 14,048.00

Pollutant: xylene
TLV (ug/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 0.06
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 43.7
MAGLC (ug/m3): 10,333.00

Pollutant: toluene
TLV (ug/m3): 188
Maximum Hourly Emission Rate (lbs/hr): 0.26
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 43.7
MAGLC (ug/m3): 4,476.00

Pollutant: methanol
TLV (ug/m3): 262
Maximum Hourly Emission Rate (lbs/hr): 0.01
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 43.7
MAGLC (ug/m3): 6,238.00

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

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

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

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

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Line #3 - Paint Mix Operations (P018)
Activity Description: Paint mixing, storage, and clean-up area for Paint Line #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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
paint mix operations, equipped with a regenerative thermal oxidizer (RTO); paint line #3.	OAC rule 3745-31-05 (A)(3) (PTI #03-10819)	0.37 lb organic compounds (OC)/hr, 0.33 ton OC/yr combustion emissions from the RTO: 0.62 lb nitrogen oxides (NOx)/hr 2.73 tons NOx/yr (see A.I.2.a.) See A.I.2.b.

2. Additional Terms and Conditions

- 2.a** Emissions units R009, R011, R018, P008, P018 and P019 are vented to a common RTO. The emission limitations of 0.62 pound NOx/hour and 2.73 tons NOx/year represent the total allowable emissions from the RTO for all these emissions units, combined.
- 2.b** Best available technology (BAT) for this emissions unit shall be the use of a RTO with a 100 percent capture efficiency and a minimum 90 percent destruction efficiency for OC, by weight.
- 2.c** This emissions unit is not subject to OAC rule 3745-21-07(G)(2) based upon the decision by the Ohio Supreme Court in Ashland Chem. Co. v. Jones (2001), 92 Ohio St.3.d 234.

II. Operational Restrictions

1. The emissions unit shall be equipped with a permanent total enclosure (PTE) which shall be installed and operated in accordance with 40 CFR Part 51, Appendix M, Method 204. The PTE shall meet the following criteria:
 - a. any natural draft opening (NDO) shall be at least 4 equivalent opening diameters from each OC emitting point unless otherwise specified by the Administrator;
 - b. the total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's 4 walls, floor, and ceiling;
 - c. the average facial velocity (FV) of air through all NDO's shall be at least 3,600 m/hr (200 fpm). The direction of air flow through all NDO's shall be into the enclosure;
 - d. all access doors and windows whose areas are not included in section (b) and are not included in the calculation in section (c) shall be closed during routine operation of the process; and
 - e. all OC the emissions must be captured and contained for discharge through a control device.
2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as a 3-hour average, whenever this emissions unit is in operation.
3. The average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

III. Monitoring and/or Record Keeping Requirements

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

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

- a. a log of the downtime for the capture (collection) system, control device and monitoring equipment, when the associated emissions unit was in operation; and
 - b. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated that the emissions unit was in compliance.
2. The permittee shall maintain and operate monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

The permittee shall maintain records of all 3-hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential of 0.007 inch of water, as a 3-hour average.

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

3. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the company identification for each coating mixed;
 - b. the number of hours this emissions unit was in operation;
 - c. the number of gallons of each coating mixed;
 - d. the OC content of each coating mixed, in pounds per gallon;
 - e. the total uncontrolled OC emission rate for all the coatings mixed [(summation of (c x d) for all the coatings) x 0.01*], in pounds;
 - f. the total controlled OC emission rate for all the coatings mixed [A.III.3.e x (1 - the overall control efficiency from the most recent performance test that demonstrated the emissions unit was in compliance)]; and
 - g. the average hourly OC emission rate for all the coatings mixed [A.III.3.f/A.III.3.b], in pounds per hour (average).

* it is assumed that 1%, by weight, of the solvents in the coatings mixed evaporates
4. The permittee shall collect and record each year the total OC emission rate for this emissions unit, in tons, calculated by summing the daily OC emission rates, from Section A.III.3.f, for the calendar year, and then dividing by 2000.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. All 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent performance test that demonstrated the emissions unit was in compliance.
 - b. All periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified above.
 - c. All exceedances of the hourly OC emission limitation of 0.37 pound.

The quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

2. The permittee shall submit annual reports that specify the actual annual OC emissions for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device and monitoring equipment, when the associated emissions unit was in operation.

V. Testing Requirements

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

V. Testing Requirements (continued)

- 1.a** Emission Limitations:
0.37 lb OC/hr and 0.33 ton OC/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly limitation above based upon the results of emission testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A and the record keeping requirements established in Section A.III.3. of this permit.

Compliance with the annual limitation shall be determined by the record keeping requirements specified in sections A.III.3. and A.III.4. of this permit.

- 1.b** Emission Limitations:
0.62 lb NO_x/hr and 2.73 TPY NO_x, from the RTO

Applicable Compliance Method:

Compliance with the hourly emission limitation may be determined by multiplying the maximum rated capacity of the RTO (6.54 mmBtu/hr) by the emission factor in AP-42, Chapter 1.4 (revised 7/98) of 100 lbs NO_x/mm cu. ft. of natural gas, and then dividing by 1020 mmBtu/mm cu. ft. of natural gas.

If required, compliance shall be determined in accordance with Methods 1 - 4 and 7 of 40 CFR, Part 60, Appendix A.

The annual emission limitation was established by multiplying the hourly NO_x limitation by 8,760 hours/year, and then dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

- 1.c** Emissions Limitation:
100% capture and 90% destruction efficiencies, by weight, for OC

Applicable Compliance Method:

Compliance with the efficiency requirements above shall be determined based upon the results of emission testing conducted in accordance with the methods outlined in Section A.V.2 of this permit.

- 2.** The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within 6 months after permit issuance. Future emission testing shall be conducted in accordance with the frequencies specified in Engineering Guide #16.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable hourly OC mass emission rate and the capture and control efficiency requirements for OC.
 - c. Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A shall be employed to demonstrate compliance with the OC allowable mass emission rate. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted while emissions units R009, R011, R018, P008, P018 and P019 are operating at their maximum capacities, unless otherwise specified or approved by the Ohio EPA, Northwest District Office.

V. Testing Requirements (continued)

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

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

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

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

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
paint mix operations, equipped with a regenerative thermal oxidizer (RTO); paint line #3.	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the BREEZE AIR ISCST3, v. 2.03 model. The predicted 1-hour maximum ground-level concentration from the use of the BREEZE AIR ISCST3, v. 2.03 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):

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

Pollutant: ethyl benzene
TLV (ug/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 0.37
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 43.7
MAGLC (ug/m3): 10,333.00

Pollutant: methyl ethyl ketone
TLV (ug/m3): 590
Maximum Hourly Emission Rate (lbs/hr): 2.54
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 43.7
MAGLC (ug/m3): 14,048.00

Pollutant: xylene
TLV (ug/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 0.06
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 43.7
MAGLC (ug/m3): 10,333.00

Pollutant: toluene
TLV (ug/m3): 188
Maximum Hourly Emission Rate (lbs/hr): 0.26
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 43.7
MAGLC (ug/m3): 4,476.00

Pollutant: methanol
TLV (ug/m3): 262
Maximum Hourly Emission Rate (lbs/hr): 0.01
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 43.7
MAGLC (ug/m3): 6,238.00

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

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

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

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Line #3 - Primer Oven (P019)

Activity Description: 1.0 MMBTU/hr Natural Gas Fired Primer Oven for plastic auto parts with flash and cooling zone

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
primer oven, equipped with a cooling zone and a regenerative thermal oxidizer (RTO); paint line #3	OAC rule 3745-31-05 (A)(3) (PTI #03-10891)	0.37 lb organic compounds (OC)/hr, 1.48 tons OC/yr
		combustion emissions from the RTO:
		0.62 lb nitrogen oxides (NOx)/hr 2.73 tons NOx/yr (see A.I.2.a)
		combustion emissions from the oven:
		0.15 lb NOx/hr 0.61 ton NOx/yr
		See A.I.2.b. and A.I.2.c.
	OAC rule 3745-21-07 (G)(1)	See A.I.2.d.
	OAC rules 3745-21-08 (B) and 3745-23-06 (B)	See A.I.2.f.
	OAC rule 3745-17-10 (B)	0.020 lb particulate emissions (PE)/mmBtu of actual heat input
	OAC rule 3745-17-07 (A)	Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

2. Additional Terms and Conditions

- Emissions units R009, R011, R018, P008, P018 and P019 are vented to a common RTO. The emission limitations of 0.62 pound NOx/hour and 2.73 tons NOx/year represent the total allowable emissions from the RTO for all these emissions units, combined.
- Best available technology (BAT) for this emissions unit shall be the use of a RTO with a 100 percent capture efficiency and a minimum 90 percent destruction efficiency for OC, by weight.

2. Additional Terms and Conditions (continued)

- 2.c** The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-08 (B), 3745-23-06 (B), 3745-17-10 (B) and 3745-17-07 (A).
- 2.d** The emission limits/control requirements specified by this rule are less stringent than the emission limits/control requirements established pursuant to OAC rule 3745-31-05 (A)(3).
- 2.e** For purposes of calculating the OC emission rates for this emissions unit and the associated spray booth (R009), the permittee shall utilize a value of 80 percent as the maximum percentage of the OCs employed in the spray booth that are emitted uncontrolled from the spray booth. The remaining 20 percent of the OCs employed in the spray booth shall be considered to be the uncontrolled emissions for this emissions unit. This "split" of OC emissions between this emissions unit and the associated spray booth is based upon best engineering judgement.
- 2.f** The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 03-10891.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.g** There are no sulfur dioxide emission limitations established by OAC Chapter 3745-18 for this emissions unit because natural gas is the only fuel burned in this emissions unit.

II. Operational Restrictions

- 1.** The emissions unit shall be equipped with a permanent total enclosure (PTE) which shall be installed and operated in accordance with 40 CFR Part 51, Appendix M, Method 204. The PTE shall meet the following criteria:
- a. any natural draft opening (NDO) shall be at least 4 equivalent opening diameters from each OC emitting point unless otherwise specified by the Administrator;
 - b. the total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's 4 walls, floor, and ceiling;
 - c. the average facial velocity (FV) of air through all NDO's shall be at least 3,600 m/hr (200 fpm). The direction of air flow through all NDO's shall be into the enclosure;
 - d. all access doors and windows whose areas are not included in section (b) and are not included in the calculation in section (c) shall be closed during routine operation of the process; and
 - e. all OC the emissions must be captured and contained for discharge through a control device.
- 2.** The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as a 3-hour average, whenever this emissions unit is in operation.
- 3.** The average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
- 4.** The annual number of hours of operation for this emissions unit shall not exceed 8,030.

III. Monitoring and/or Record Keeping Requirements

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

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

- a. a log of the downtime for the capture (collection) system, control device and monitoring equipment, when the associated emissions unit was in operation; and
 - b. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated that the emissions unit was in compliance.
2. The permittee shall maintain and operate monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

The permittee shall maintain records of all 3-hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential of 0.007 inch of water, as a 3-hour average.

3. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the total potential uncontrolled OC emissions for the spray booths associated with this emissions unit (from Section A.III.4.d of emissions unit R009), in pounds;
 - b. the total potential OC emission rate, in pounds, calculated by multiplying A.III.3.a by the maximum percentage of the emissions associated with this emissions unit (as defined in Section A.I.2.d. of this permit), in pounds;
 - c. the total controlled OC emission rate, in pounds, calculated by multiplying A.III.3.b by (1 - the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance); and
 - d. the number of hours of operation;
 - e. the average hourly controlled OC emission rate, i.e., (c)/(d), in pounds per hour (average).
4. The permittee shall collect and record each year the following information for this emissions unit:
 - a. the total controlled OC emission rate, in tons, calculated by summing the daily OC emission rates, from Section A.III.3.c, for the calendar year, and dividing by 2000; and
 - b. the total number of hours of operation, calculated by summing the daily numbers of hours of operation, from Section A.III.3.d, for the calendar year.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions units were in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated that the emissions unit was in compliance; and
 - b. all exceedances of the hourly OC emission limitation of 0.37 pound.
2. The permittee shall submit quarterly pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified above.
3. The quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
4. The permittee shall submit annual reports that specify the total actual OC emissions and the total actual number of hours of operation for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
5. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device and monitoring equipment, when the associated emissions unit was in operation.

V. Testing Requirements

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

- 1.a Emission Limitations:
0.37 lb OC/hr and 1.48 tons OC/yr

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation shall be determined by emission testing conducted in accordance with Methods 18, 25, or 25 A, as appropriate, of 40 CFR, Part 60, Appendix A and also the record keeping requirements established in Section A.III.3. of this permit.

Compliance with the annual limitation shall be determined by the record keeping requirements established in Sections A.III.3. and A.III.4. of this permit.

- 1.b Emission Limitations:
0.62 lb NO_x/hr and 2.73 TPY NO_x, from the RTO

Applicable Compliance Method:

Compliance with the hourly emission limitation may be determined by multiplying the maximum rated capacity of the RTO (6.54 mmBtu/hr) by the emission factor in AP-42, Chapter 1.4 (revised 7/98) of 100 lbs NO_x/mm cu. ft. of natural gas, and then dividing by 1020 mmBtu/mm cu. ft. of natural gas.

If required, compliance shall be determined in accordance with Methods 1 - 4 and 7 of 40 CFR, Part 60, Appendix A.

The annual emission limitation was established by multiplying the hourly NO_x limitation by 8,760 hours/year, and then dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

V. Testing Requirements (continued)

- 1.c** Emission Limitations:
0.15 lb NOx/hr and 0.61 ton NOx/yr, from the oven

Applicable Compliance Method:

Compliance with the hourly emission limitation may be determined by multiplying the maximum rated capacity of the oven (1.0 mmBtu/hr) by the emission factor in AP-42, Chapter 1.4 (revised 7/98) of 100 lbs NOx/mm cu. ft. of natural gas, and then dividing by 1020 mmBtu/mm cu. ft. of natural gas.

If required, compliance shall be determined in accordance with Methods 1 - 4 and 7 of 40 CFR, Part 60, Appendix A.

The annual NOx emission limitation was established by multiplying the hourly NOx emission limitation by 8030 hours/year, and then dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly emission limitation and with the restriction on the annual number of hours of operation, compliance shall also be shown with the annual emission limitation.

- 1.d** Emissions Limitation:
100% capture and 90% destruction efficiencies, by weight, for OC

Applicable Compliance Method:

Compliance with the efficiency requirements above shall be determined based upon the results of emission testing conducted in accordance with the methods outlined in Section A.V.2. of this permit.

- 1.e** Emission Limitation:
8,030 hours of operation/yr

Applicable Compliance Method:

Compliance with the annual restriction on the number of hours of operation shall be determined by the record keeping requirements specified in Sections A.III.3. and A.III.4. of this permit.

- 2.** The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within 6 months after permit issuance. Future emission testing shall be conducted in accordance with the frequencies specified in Engineering Guide #16.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable hourly OC mass emission rate and the capture and control efficiency requirements for OC.
 - c. Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A shall be employed to demonstrate compliance with the allowable mass emission rate for OC. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - d. The test(s) shall be conducted while emissions units R009, R011, R018, P008, P018 and P019 are operating at their maximum capacities, unless otherwise specified or approved by the Ohio EPA, Northwest District Office.

V. Testing Requirements (continued)

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

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

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

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
primer oven, equipped with a cooling zone and a regenerative thermal oxidizer (RTO); paint line #3	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the BREEZE AIR ISCST3, v. 2.03 model. The predicted 1-hour maximum ground-level concentration from the use of the BREEZE AIR ISCST3, v. 2.03 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):

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

Pollutant: ethyl benzene
TLV (ug/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 0.37
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 43.7
MAGLC (ug/m3): 10,333.00

Pollutant: methyl ethyl ketone
TLV (ug/m3): 590
Maximum Hourly Emission Rate (lbs/hr): 2.54
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 43.7
MAGLC (ug/m3): 14,048.00

Pollutant: xylene
TLV (ug/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 0.06
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 43.7
MAGLC (ug/m3): 10,333.00

Pollutant: toluene
TLV (ug/m3): 188
Maximum Hourly Emission Rate (lbs/hr): 0.26
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 43.7
MAGLC (ug/m3): 4,476.00

Pollutant: methanol
TLV (ug/m3): 262
Maximum Hourly Emission Rate (lbs/hr): 0.01
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 43.7
MAGLC (ug/m3): 6,238.00

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

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

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

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

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Blending Operation (P021)

Activity Description: On-site area for paint suppliers to blend, test, and store various coating formulations.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
paint blending operations	OAC rule 3745-31-05 (A)(3) (PTI #03-13836)	185.04 lbs organic compounds (OC)/day 11.3 tons OC/yr (See A.1.2.a.)
	OAC rule 3745-31-05(D) (PTI #03-13836)	82.80 lbs volatile organic compounds (VOC)/day (See A.1.2.a.) See A.1.2.b. 5.0 tons VOC per rolling, 365-day period (See A.1.2.a & A.1.2.c.)

2. Additional Terms and Conditions

- 2.a The VOC emission limitations represent VOC emissions as defined in OAC rule 3745-21-01 (B)(6). The organic compound limitations represent OC emissions which are not defined as VOC (i.e., OCs are not inclusive of VOCs).
- 2.b The requirements of this rule also include compliance with requirements of OAC rule 3745-31-05 (D).
- 2.c The permittee has requested a federally enforceable emission limitation for the paint blending operation of 5.0 tons VOC per rolling, 365-day period for purposes of avoiding Prevention of Significant Deterioration (PSD) applicability.
- 2.d This emissions unit is not subject to OAC rule 3745-21-07(G)(2) based upon the decision by the Ohio Supreme Court in Ashland Chem. Co. v. Jones (2001), 92 Ohio St.3.d 234.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for this emissions unit:
 - a. The company identification for each blending operation performed (i.e., batch mixing, filling, or tank cleaning).
 - b. The number of hours each blending operation was performed.
 - c. The VOC and OC emission factors, in pounds/hr, for each blending operation, calculated in accordance with the methodology outlined in PTI application number 03-13836 submitted by the permittee on November 13, 2002.
 - d. The VOC and OC emission rates for all the blending operations, in pounds [summation of (b x c) for all blending operations).
 - e. The annual, year- to-date OC emission rate, in tons, from all the paint blending operations (summation of d for the OC emissions for each calendar day-to-date, from January to December, divided by 2000).
 - f. The rolling, 365-day VOC emission rate for all the blending operations, in tons.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, that identify the following:
 - a. all exceedances of the daily OC emission limitation of 185.04 pounds;
 - b. all exceedances of the daily VOC emission limitation of 82.80 pounds; and
 - c. all exceedances of the rolling, 365-day VOC emission limitation of 5.0 tons.

The permittee shall include in the report the actual emissions for each such day.

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

V. Testing Requirements

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

- 1.a Emission Limitations:
185.04 lbs OC/day and 11.3 tons OC/yr

Applicable Compliance Method:

The record keeping requirements specified in Section A.III.1 of this permit shall be used to determine compliance with the daily and annual OC emission limitations above.

- 1.b Emission Limitation:
82.80 lbs VOC/day and 5.0 tons VOC per rolling, 365-day period

Applicable Compliance Method:

The record keeping requirements specified in Section A.III.1 of this permit shall be used to determine compliance with the daily and annual VOC emission limitations above.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
paint blending operation	none	none

2. **Additional Terms and Conditions**

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 dispersion model. The predicted 1-hour maximum ground-level concentrations from the use of the ISCST3 dispersion model was compared to the Maximum Acceptable Ground-Level Concentrations (MAGLC). The following table summarizes the results of the modeling for the "worst case" pollutant(s):

Air Toxic: Ethylbenzene
TLV (mg/m3): 434.73
MAGLC (ug/m3): 10337.91
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Styrene
TLV (mg/m3): 85.20
MAGLC (ug/m3): 2028.63
Maximum 1-Hour Average Concentration (ug/m3): 1.66

Air Toxic: Methyl Propyl Ketone
TLV (mg/m3): 704.87
MAGLC (ug/m3): 16782.55
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Methyl Isobutyl Ketone
TLV (mg/m3): 204.83
MAGLC (ug/m3): 4876.81
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Mesithylene
TLV (mg/m3): 122.89
MAGLC (ug/m3): 2926.04
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Diisobutyl Ketone
TLV (mg/m3): 145.43
MAGLC (ug/m3): 3462.61
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Toluene
TLV (mg/m3): 188.40
MAGLC (ug/m3): 4485.83
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Ketoheptamethylene (Cyclohexanone)
TLV (mg/m3): 96.30
MAGLC (ug/m3): 2292.82
Maximum 1-Hour Average Concentration (ug/m3): 126.90

Air Toxic: Isobutyl Acetate
TLV (mg/m3): 712.64
MAGLC (ug/m3): 16967.57
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

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

Air Toxic: Methyl Amyl Ketone
TLV (mg/m3): 233.50
MAGLC (ug/m3): 5559.45
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: n-Butyl Acetate
TLV (mg/m3): 712.64
MAGLC (ug/m3): 16967.57
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Isoamyl Acetate
TLV (mg/m3): 266.26
MAGLC (ug/m3): 6339.47
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Xylene
TLV (mg/m3): 434.19
MAGLC (ug/m3): 10337.91
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Ethyl Acetate
TLV (mg/m3): 1441.31
MAGLC (ug/m3): 34316.88
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: n-Heptane
TLV (mg/m3): 1639.26
MAGLC (ug/m3): 39030.09
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Trimethylbenzene
TLV (mg/m3): 122.89
MAGLC (ug/m3): 2926.04
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: n-Amyl Acetate
TLV (mg/m3): 266.26
MAGLC (ug/m3): 6339.47
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Ethyl Alcohol
TLV (mg/m3): 1884.25
MAGLC (ug/m3): 44863.18
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Methyl Alcohol
TLV (mg/m3): 262.09
MAGLC (ug/m3): 6240.14
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Isopropyl Alcohol
TLV (mg/m3): 983.07
MAGLC (ug/m3): 23406.37
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Facility Name: **Eaton Inoac Company**
Facility ID: **03-72-03-0199**
Emissions Unit: **Paint Blending Operation (P021)**

Air Toxic: n-Butyl Alcohol
TLV (mg/m3): 151.57
MAGLC (ug/m3): 3608.92
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Isobutyl Alcohol
TLV (mg/m3): 151.57
MAGLC (ug/m3): 3608.92
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Methyl Ethyl Ketone
TLV (mg/m3): 589.78
MAGLC (ug/m3): 14042.26
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Stoddard Solvent
TLV (mg/m3): 572.60
MAGLC (ug/m3): 13633.27
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Hexamethylene Diisocyanate
TLV (mg/m3): 0.03
MAGLC (ug/m3): 0.82
Maximum 1-Hour Average Concentration (ug/m3): 0.81

Air Toxic: 1,2,4-Trimethylbenzene
TLV (mg/m3): 122.89
MAGLC (ug/m3): 2926.04
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

Air Toxic: Isopropylbenzene
TLV (mg/m3): 245.79
MAGLC (ug/m3): 5852.08
Maximum 1-Hour Average Concentration (ug/m3): 2293.58

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

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

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

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Line #3 - Primer Booth (R009)
Activity Description: Paint Spray Booth for Coating Plastic Automobile 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
primer booth, equipped with a water curtain system, flash zone, and a regenerative thermal oxidizer (RTO); paint line #3	OAC rule 3745-31-05 (A)(3) (PTI #03-10819)	1.94 lbs organic compounds (OC)/hr 7.76 tons OC/yr (for this emissions unit)
		0.068 lb particulate emissions (PE)/hr, 0.28 ton PE/yr
		Visible PE shall not exceed 0% opacity, as a six-minute average.
		combustion emissions from the RTO:
		0.62 lb nitrogen oxides (NOx)/hr 2.73 tons NOx/yr (see A.I.2.a.)
		See A.I.2.b.
	OAC rule 3745-21-07 (G)(2)	See A.I.2.c.
OAC rule 3745-17-11 (B)	See A.I.2.e.	
OAC rule 3745-17-07 (A)	See A.I.2.e.	

2. Additional Terms and Conditions

- 2.a Emissions units R009, R011, R018, P008, P018 and P019 are vented to a common RTO. The emission limitations of 0.62 pound NOx/hour and 2.73 tons NOx/year represent the total allowable emissions from the RTO for all these emissions units, combined.
- 2.b Best available technology (BAT) for this emissions unit shall be the use of a RTO with a 100 percent capture efficiency and a minimum 90 percent destruction efficiency for OC, by weight.
- 2.c The hourly emission limitation and control efficiency requirements based on this rule are less stringent than the hourly emission limitation and control efficiency requirements established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions (continued)

- 2.d** For purposes of calculating the organic compound emission rates for this emissions unit and the associated oven (P019), the permittee shall utilize a value of 80 percent as the maximum percentage of the OCs employed in the paint booth that are emitted uncontrolled from the paint booth. The remaining 20 percent of the OCs employed in the paint booth shall be considered to be the uncontrolled emissions for the associated oven. This "split" of OC emissions between this emissions unit and the associated oven is based upon best engineering judgement.
- 2.e** The emission limitation based on this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

II. Operational Restrictions

1. The emissions unit shall be equipped with a permanent total enclosure (PTE) which shall be installed and operated in accordance with 40 CFR Part 51, Appendix M, Method 204. The PTE shall meet the following criteria:
 - a. any natural draft opening (NDO) shall be at least 4 equivalent opening diameters from each OC emitting point unless otherwise specified by the Administrator;
 - b. the total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's 4 walls, floor, and ceiling;
 - c. the average facial velocity (FV) of air through all NDO's shall be at least 3,600 m/hr (200 fpm). The direction of air flow through all NDO's shall be into the enclosure;
 - d. all access doors and windows whose areas are not included in section (b) and are not included in the calculation in section (c) shall be closed during routine operation of the process; and
 - e. all OC the emissions must be captured and contained for discharge through a control device.
2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as a 3-hour average, whenever this emissions unit is in operation.
3. The average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
4. The permittee shall operate the water wash system whenever this emissions unit is in operation.
5. The annual number of hours of operation for this emissions unit shall not exceed 8,030.

III. Monitoring and/or Record Keeping Requirements

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

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

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

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

- a. a log of the downtime for the capture (collection) system, control device and monitoring equipment, when the associated emissions unit was in operation; and
- b. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated that the emissions unit was in compliance.

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

The permittee shall maintain records of all 3-hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential of 0.007 inch of water, as a 3-hour average.

4. The permittee shall collect and record the following information each day for this emissions unit:
- 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 employed, in pounds per gallon;
 - d. the total potential (prior to applying the booth/oven "split") OC emission rate for all the coatings employed [summation of (b x c) for all coatings], in pounds;
 - e. the total potential OC emission rate for all the coatings employed, in pounds, calculated by multiplying the OC emissions (from Section A.III.4.d) by the maximum percentage of the emissions associated with this emissions unit (as defined in Section A.I.2.d. of this permit);
 - f. the total controlled OC emission rate for all the coatings and cleanup materials employed, in pounds, calculated by multiplying the [OC emissions (from Section A.III.4.e) + summation of (b x c) for all cleanup materials] by (1 - the overall control efficiency from the most recent performance test that demonstrated the emissions unit was in compliance);
 - g. the number of hours of operation; and
 - e. the average hourly controlled OC emission rate, i.e., (f)/(g), in pounds per hour (average).

5. The permittee shall collect and record each year the following information for this emissions unit:
- a. the total controlled OC emission rate for all the coatings and cleanup materials, in tons, calculated by summing the daily OC emission rates, from Section A.III.4.f, for the calendar year, and dividing by 2000; and
 - b. the total number of hours of operation, calculated by summing the daily numbers of hours of operation, from Section A.III.4.g, for the calendar year.

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 water wash system was not in service when the emission 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 identify the following:
 - a. All 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent performance test that demonstrated the emissions unit was in compliance.
 - b. All periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified above.
 - c. All exceedances of the hourly OC emission limitation of 1.94 pounds.

The quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

3. The permittee shall submit annual reports that specify the total actual OC emissions and the total actual number of hours of operation for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
4. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device and monitoring equipment, when the associated emissions unit was in operation.

V. Testing Requirements

1. Compliance with the emission limitations specified in Section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - 1.a Emission Limitations:
1.94 lbs OC/hr & 7.76 tons OC/yr

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation shall be determined by emission testing conducted in accordance with Methods 18, 25, or 25 A, as appropriate, of 40 CFR, Part 60, Appendix A and also the record keeping requirements established in Section A.III.4 of this permit.

Compliance with the annual limitation shall be determined by the record keeping requirements specified in Sections A.III.4 and 5 of this permit.

V. Testing Requirements (continued)

1.b Emission Limitations:
0.068 lb PE/hr & 0.28 ton PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with the actual worst case hourly PE rate (E) using the following equation for the paint spraying operations:

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

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

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, compliance with the PE limitation above shall be determined in accordance with the test methods specified in 40 CFR, Part 60, Appendix A, Methods 1 - 5.

The annual limitation was established by multiplying the hourly PE limitation by 8030 hours/year, and then dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly emission limitation and the annual restriction on the number of hours of operation, compliance shall also be shown with the annual PE limitation.

1.c Emission Limitations:
0.62 lb NO_x/hr and 2.73 TPY NO_x, from the RTO

Applicable Compliance Method:

Compliance with the hourly emission limitation may be determined by multiplying the maximum rated capacity of the RTO (6.54 mmBtu/hr) by the emission factor in AP-42, Chapter 1.4 (revised 7/98) of 100 lbs NO_x/mm cu. ft. of natural gas, and then dividing by 1020 mmBtu/mm cu. ft. of natural gas.

If required, compliance shall be determined in accordance with Methods 1 - 4 and 7 of 40 CFR, Part 60, Appendix A.

The annual emission limitation was established by multiplying the hourly NO_x limitation by 8,760 hours/year, and then dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

1.d Emission Limitation:
Visible PE shall not exceed 0% opacity, as a six-minute average.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible PE limitation above in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

1.e Emissions Limitation:
100% capture and 90% destruction efficiencies, by weight, for OCs

Applicable Compliance Method:

Compliance with the efficiency requirements above shall be determined based upon the results of emission testing conducted in accordance with the methods outlined in Section A.V.2 of this permit.

V. Testing Requirements (continued)

- 1.f Emission Limitation:
8,030 hours of operation/yr

Applicable Compliance Method:

Compliance with the annual restriction on the number of hours of operation shall be determined by the record keeping requirements specified in Sections A.III.4. and A.III.5. of this permit.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- The emission testing shall be conducted within 6 months after permit issuance. Future emission testing shall be conducted in accordance with the frequencies specified in Engineering Guide #16.
 - The emission testing shall be conducted to demonstrate compliance with the allowable hourly OC mass emission rate and the capture and control efficiencies for OC.
 - Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A shall be employed to demonstrate compliance with the allowable mass emission rate for OC. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - The test(s) shall be conducted while emissions units R009, R011, R018, P008, P018 and P019 are operating at their maximum capacities, unless otherwise specified or approved by the Ohio EPA, Northwest District Office.

An OC emission test also shall be conducted on emissions unit P018 to determine oven/booth split as defined in section A.I.2.d of this permit.

- The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR, Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in the approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
3. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions units operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Northwest District Office's refusal to accept the results of the emission test(s).

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

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

V. Testing Requirements (continued)

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
primer booth, equipped with a water curtain system, flash zone, and a regenerative thermal oxidizer (RTO); paint line #3	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the BREEZE AIR ISCST3, v. 2.03 model. The predicted 1-hour maximum ground-level concentration from the use of the BREEZE AIR ISCST3, v. 2.03 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):

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

Pollutant: ethyl benzene
TLV (ug/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 0.37
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 43.7
MAGLC (ug/m3): 10,333.00

Pollutant: methyl ethyl ketone
TLV (ug/m3): 590
Maximum Hourly Emission Rate (lbs/hr): 2.54
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 43.7
MAGLC (ug/m3): 14,048.00

Pollutant: xylene
TLV (ug/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 0.06
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 43.7
MAGLC (ug/m3): 10,333.00

Pollutant: toluene
TLV (ug/m3): 188
Maximum Hourly Emission Rate (lbs/hr): 0.26
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 43.7
MAGLC (ug/m3): 4,476.00

Pollutant: methanol
TLV (ug/m3): 262
Maximum Hourly Emission Rate (lbs/hr): 0.01
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 43.7
MAGLC (ug/m3): 6,238.00

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

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

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

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Line #3 - Clear Booth (R011)
Activity Description: Paint Spray Booth for Coating Plastic Automobile 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
clearcoat booth, equipped with a water curtain system, flash zone, and a regenerative thermal oxidizer (RTO); paint line #3	OAC rule 3745-31-05 (A)(3) (PTI #03-10819)	1.96 lbs organic compounds (OC)/hr 7.88 tons OC/yr (for this emissions unit)
		0.096 lb particulate emissions (PE)/hr, 0.38 ton PE/yr
		Visible PE shall not exceed 0% opacity, as a six-minute average.
		combustion emissions from the RTO:
		0.62 lb nitrogen oxides (NOx)/hr 2.73 tons NOx/yr (see A.I.2.a.)
		See A.I.2.b.
	OAC rule 3745-21-07 (G)(2)	See A.I.2.c.
	OAC rule 3745-17-11 (B)	See A.I.2.e.
	OAC rule 3745-17-07 (A)	See A.I.2.e.

2. Additional Terms and Conditions

- 2.a Emissions units R009, R011, R018, P008, P018 and P019 are vented to a common RTO. The emission limitations of 0.62 pound NOx/hour and 2.73 tons NOx/year represent the total allowable emissions from the RTO for all these emissions units, combined.
- 2.b Best available technology (BAT) for this emissions unit shall be the use of a RTO with a 100 percent capture efficiency and a minimum 90 percent destruction efficiency for OC, by weight.
- 2.c The hourly emission limitation and control efficiency requirements based on this rule are less stringent than the hourly emission limitation and control efficiency requirements established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions (continued)

- 2.d** For purposes of calculating the organic compound emission rates for this emissions unit and the associated oven (P008), the permittee shall utilize a value of 80 percent as the maximum percentage of the OCs employed in the paint booth that are emitted uncontrolled from the paint booth. The remaining 20 percent of the OCs employed in the paint booth shall be considered to be the uncontrolled emissions for the associated oven. This "split" of OC emissions between this emissions unit and the associated oven is based upon best engineering judgement.
- 2.e** The emission limitation based on this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

II. Operational Restrictions

1. The emissions unit shall be equipped with a permanent total enclosure (PTE) which shall be installed and operated in accordance with 40 CFR Part 51, Appendix M, Method 204. The PTE shall meet the following criteria:
 - a. any natural draft opening (NDO) shall be at least 4 equivalent opening diameters from each OC emitting point unless otherwise specified by the Administrator;
 - b. the total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's 4 walls, floor, and ceiling;
 - c. the average facial velocity (FV) of air through all NDO's shall be at least 3,600 m/hr (200 fpm). The direction of air flow through all NDO's shall be into the enclosure;
 - d. all access doors and windows whose areas are not included in section (b) and are not included in the calculation in section (c) shall be closed during routine operation of the process; and
 - e. all OC the emissions must be captured and contained for discharge through a control device.
2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as a 3-hour average, whenever this emissions unit is in operation.
3. The average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
4. The permittee shall operate the water wash system whenever this emissions unit is in operation.
5. The annual number of hours of operation for this emissions unit shall not exceed 8,030.

III. Monitoring and/or Record Keeping Requirements

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

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

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

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

- a. a log of the downtime for the capture (collection) system, control device and monitoring equipment, when the associated emissions unit was in operation; and
- b. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated that the emissions unit was in compliance.

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

The permittee shall maintain records of all 3-hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential of 0.007 inch of water, as a 3-hour average.

4. The permittee shall collect and record the following information each day for this emissions unit:
- 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 employed, in pounds per gallon;
 - d. the total potential (prior to applying the booth/oven "split") OC emission rate for all the coatings employed [summation of (b x c) for all coatings], in pounds;
 - e. the total potential OC emission rate for all the coatings employed, in pounds, calculated by multiplying the OC emissions (from Section A.III.4.d) by the maximum percentage of the emissions associated with this emissions unit (as defined in Section A.I.2.d. of this permit);
 - f. the total controlled OC emission rate for all the coatings and cleanup materials employed, in pounds, calculated by multiplying the [OC emissions (from Section A.III.4.e) + summation of (b x c) for all cleanup materials] by (1 - the overall control efficiency from the most recent performance test that demonstrated the emissions unit was in compliance);
 - g. the number of hours of operation; and
 - e. the average hourly controlled OC emission rate, i.e., (f)/(g), in pounds per hour (average).

5. The permittee shall collect and record each year the following information for this emissions unit:
- a. the total controlled OC emission rate for all the coatings and cleanup materials, in tons, calculated by summing the daily OC emission rates, from Section A.III.4.f, for the calendar year, and dividing by 2000; and
 - b. the total number of hours of operation, calculated by summing the daily numbers of hours of operation, from Section A.III.4.g, for the calendar year.

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 water wash system was not in service when the emission 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 identify the following:
 - a. All 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent performance test that demonstrated the emissions unit was in compliance.
 - b. All periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified above.
 - c. All exceedances of the hourly OC emission limitation of 1.96 pounds.

The quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

3. The permittee shall submit annual reports that specify the total actual OC emissions and the total actual number of hours of operation for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
4. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device and monitoring equipment, when the associated emissions unit was in operation.

V. Testing Requirements

1. Compliance with the emission limitations specified in Section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - 1.a Emission Limitations:
1.96 lbs OC/hr & 7.88 tons OC/yr

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation shall be determined by emission testing conducted in accordance with Methods 18, 25, or 25 A, as appropriate, of 40 CFR, Part 60, Appendix A and also the record keeping requirements established in Section A.III.4 of this permit.

Compliance with the annual limitation shall be determined by the record keeping requirements specified in Sections A.III.4 and 5 of this permit.

V. Testing Requirements (continued)

- 1.b** Emission Limitations:
0.096 lb PE/hr & 0.38 ton PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with the actual worst case hourly PE rate (E) using the following equation for the paint spraying operations:

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

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

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, compliance with the PE limitation above shall be determined in accordance with the test methods specified in 40 CFR, Part 60, Appendix A, Methods 1 - 5.

The annual limitation was established by multiplying the hourly PE limitation by 8030 hours/year, and then dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly emission limitation and the annual restriction on the number of hours of operation, compliance shall also be shown with the annual PE limitation.

- 1.c** Emission Limitations:
0.62 lb NO_x/hr and 2.73 TPY NO_x, from the RTO

Applicable Compliance Method:

Compliance with the hourly emission limitation may be determined by multiplying the maximum rated capacity of the RTO (6.54 mmBtu/hr) by the emission factor in AP-42, Chapter 1.4 (revised 7/98) of 100 lbs NO_x/mm cu. ft. of natural gas, and then dividing by 1020 mmBtu/mm cu. ft. of natural gas.

If required, compliance shall be determined in accordance with Methods 1 - 4 and 7 of 40 CFR, Part 60, Appendix A.

The annual emission limitation was established by multiplying the hourly NO_x limitation by 8,760 hours/year, and then dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

- 1.d** Emission Limitation:
Visible PE shall not exceed 0% opacity, as a six-minute average.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible PE limitation above in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

- 1.e** Emissions Limitation:
100% capture and 90% destruction efficiencies, by weight, for OCs

Applicable Compliance Method:

Compliance with the efficiency requirements above shall be determined based upon the results of emission testing conducted in accordance with the methods outlined in Section A.V.2 of this permit.

V. Testing Requirements (continued)

- 1.f Emission Limitation:
8,030 hours of operation/yr

Applicable Compliance Method:

Compliance with the annual restriction on the number of hours of operation shall be determined by the record keeping requirements specified in Sections A.III.4. and A.III.5. of this permit.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- The emission testing shall be conducted within 6 months after permit issuance. Future emission testing shall be conducted in accordance with the frequencies specified in Engineering Guide #16.
 - The emission testing shall be conducted to demonstrate compliance with the allowable hourly OC mass emission rate and the capture and control efficiencies for OC.
 - Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A shall be employed to demonstrate compliance with the allowable mass emission rate for OC. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - The test(s) shall be conducted while emissions units R009, R011, R018, P008, P018 and P019 are operating at their maximum capacities, unless otherwise specified or approved by the Ohio EPA, Northwest District Office.
 - The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR, Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in the approved alternative test protocol. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
3. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions units operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Northwest District Office's refusal to accept the results of the emission test(s).

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

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

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

Facility Name: **Eaton Inoac Company**
Facility ID: **03-72-03-0199**
Emissions Unit: **Paint Line #3 - Clear Booth (R011)**

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
clearcoat booth, equipped with a water curtain system, flash zone, and a regenerative thermal oxidizer (RTO); paint line #3	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the BREEZE AIR ISCST3, v. 2.03 model. The predicted 1-hour maximum ground-level concentration from the use of the BREEZE AIR ISCST3, v. 2.03 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):

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

Pollutant: ethyl benzene
TLV (ug/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 0.37
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 43.7
MAGLC (ug/m3): 10,333.00

Pollutant: methyl ethyl ketone
TLV (ug/m3): 590
Maximum Hourly Emission Rate (lbs/hr): 2.54
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 43.7
MAGLC (ug/m3): 14,048.00

Pollutant: xylene
TLV (ug/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 0.06
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 43.7
MAGLC (ug/m3): 10,333.00

Pollutant: toluene
TLV (ug/m3): 188
Maximum Hourly Emission Rate (lbs/hr): 0.26
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 43.7
MAGLC (ug/m3): 4,476.00

Pollutant: methanol
TLV (ug/m3): 262
Maximum Hourly Emission Rate (lbs/hr): 0.01
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 43.7
MAGLC (ug/m3): 6,238.00

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

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

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

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Line #3 - Color Booth (R018)
Activity Description: Color Paint Spray Booth for Coating Plastic Automobile 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
color booth, equipped with a water curtain system, flash zone, and a regenerative thermal oxidizer (RTO); paint line #3	OAC rule 3745-31-05 (A)(3) (PTI #03-10819)	3.53 lbs organic compounds (OC)/hr 14.16 tons OC/yr (for this emissions unit)
		0.021 lb particulate emissions (PE)/hr, 0.09 ton PE/yr
		Visible PE shall not exceed 0% opacity, as a six-minute average.
		combustion emissions from the RTO:
		0.62 lb nitrogen oxides (NOx)/hr 2.73 tons NOx/yr (see A.I.2.a.)
	OAC rule 3745-21-07 (G)(2)	See A.I.2.b.
	OAC rule 3745-17-11 (B)	See A.I.2.c.
	OAC rule 3745-17-07 (A)	See A.I.2.d.

2. Additional Terms and Conditions

- 2.a Emissions units R009, R011, R018, P008, P018 and P019 are vented to a common RTO. The emission limitations of 0.62 pound NOx/hour and 2.73 tons NOx/year represent the total allowable emissions from the RTO for all these emissions units, combined.
- 2.b Best available technology (BAT) for this emissions unit shall be the use of a RTO with a 100 percent capture efficiency and a minimum 90 percent destruction efficiency for OC, by weight.
- 2.c The hourly emission limitation and control efficiency requirements based on this rule are less stringent than the hourly emission limitation and control efficiency requirements established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions (continued)

- 2.d** The emission limitation based on this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

II. Operational Restrictions

1. The emissions unit shall be equipped with a permanent total enclosure (PTE) which shall be installed and operated in accordance with 40 CFR Part 51, Appendix M, Method 204. The PTE shall meet the following criteria:
 - a. any natural draft opening (NDO) shall be at least 4 equivalent opening diameters from each OC emitting point unless otherwise specified by the Administrator;
 - b. the total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's 4 walls, floor, and ceiling;
 - c. the average facial velocity (FV) of air through all NDO's shall be at least 3,600 m/hr (200 fpm). The direction of air flow through all NDO's shall be into the enclosure;
 - d. all access doors and windows whose areas are not included in section (b) and are not included in the calculation in section (c) shall be closed during routine operation of the process; and
 - e. all OC the emissions must be captured and contained for discharge through a control device.
2. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inch of water, as a 3-hour average, whenever this emissions unit is in operation.
3. The average combustion temperature within the RTO, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
4. The permittee shall operate the water wash system whenever this emissions unit is in operation.
5. The annual number of hours of operation for this emissions unit shall not exceed 8,030.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records that document any time periods when the water wash system was not in service when the emissions unit was in operation.
2. The permittee shall operate and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the RTO whenever this emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

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

- a. a log of the downtime for the capture (collection) system, control device and monitoring equipment, when the associated emissions unit was in operation; and
- b. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated that the emissions unit was in compliance.

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

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

The permittee shall maintain records of all 3-hour blocks of time during which the permanent total enclosure was not maintained at or above the minimum pressure differential of 0.007 inch of water, as a 3-hour average.

4. The permittee shall collect and record the following information each day for this emissions unit:
- 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 employed, in pounds per gallon;
 - d. the total potential OC emission rate for all the coatings employed [summation of (b x c) for all coatings], in pounds;
 - e. the total controlled OC emission rate for all the coatings and cleanup materials employed, in pounds, calculated by multiplying the [OC emissions (from Section A.III.4.d) + summation of (b x c) for all cleanup materials] by (1 - the overall control efficiency from the most recent performance test that demonstrated the emissions unit was in compliance);
 - f. the number of hours of operation; and
 - g. the average hourly controlled OC emission rate, i.e., (e)/(f), in pounds per hour (average).
5. The permittee shall collect and record each year the following information for this emissions unit:
- a. the total controlled OC emission rate for all the coatings and cleanup materials, in tons, calculated by summing the daily OC emission rates, from Section A.III.4.e, for the calendar year, and dividing by 2000; and
 - b. the total number of hours of operation, calculated by summing the daily numbers of hours of operation, from Section A.III.4.f, for the calendar year.

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 water wash system was not in service when the emission 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 identify the following:
- a. All 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent performance test that demonstrated the emissions unit was in compliance.
 - b. All periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified above.
 - c. All exceedances of the hourly OC emission limitation of 3.53 pounds.

The quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

IV. Reporting Requirements (continued)

3. The permittee shall submit annual reports that specify the total actual OC emissions and the total actual number of hours of operation for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
4. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device and monitoring equipment, when the associated emissions unit was in operation.

V. Testing Requirements

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

- 1.a Emission Limitations:
3.53 lbs OC/hr & 14.16 tons OC/yr

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation shall be determined by emission testing conducted in accordance with Methods 18, 25, or 25 A, as appropriate, of 40 CFR, Part 60, Appendix A and also the record keeping requirements established in Section A.III.4. of this permit.

Compliance with the annual limitation shall be determined by the record keeping requirements specified in Sections A.III.4. and A.III.5. of this permit.

- 1.b Emission Limitations:
0.021 lb PE/hr & 0.09 ton PE/yr

Applicable Compliance Method:

The permittee may demonstrate compliance with the actual worst case hourly PE rate (E) using the following equation for the paint spraying operations:

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

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

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, compliance with the PE limitation above shall be determined in accordance with the test methods specified in 40 CFR, Part 60, Appendix A, Methods 1 - 5.

The annual limitation was established by multiplying the hourly PE limitation by 8030 hours/year, and then dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly emission limitation and the annual restriction on the number of hours of operation, compliance shall also be shown with the annual PE limitation.

V. Testing Requirements (continued)

- 1.c** Emission Limitations:
0.62 lb NO_x/hr and 2.73 TPY NO_x, from the RTO

Applicable Compliance Method:

Compliance with the hourly emission limitation may be determined by multiplying the maximum rated capacity of the RTO (6.54 mmBtu/hr) by the emission factor in AP-42, Chapter 1.4 (revised 7/98) of 100 lbs NO_x/mm cu. ft. of natural gas, and then dividing by 1020 mmBtu/mm cu. ft. of natural gas.

If required, compliance shall be determined in accordance with Methods 1 - 4 and 7 of 40 CFR, Part 60, Appendix A.

The annual emission limitation was established by multiplying the hourly NO_x limitation by 8,760 hours/year, and then dividing by 2000 pounds/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

- 1.d** Emission Limitation:
Visible PE shall not exceed 0% opacity, as a six-minute average.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible PE limitation above in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

- 1.e** Emissions Limitation:
100% capture and 90% destruction efficiencies, by weight, for OCs

Applicable Compliance Method:

Compliance with the efficiency requirements above shall be determined based upon the results of emission testing conducted in accordance with the methods outlined in Section A.V.2 of this permit.

- 1.f** Emission Limitation:
8,030 hours of operation/yr

Applicable Compliance Method:

Compliance with the annual restriction on the number of hours of operation shall be determined by the record keeping requirements specified in Sections A.III.4. and A.III.5. of this permit.

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

a. The emission testing shall be conducted within 6 months after permit issuance. Future emission testing shall be conducted in accordance with the frequencies specified in Engineering Guide #16.

The emission testing shall be conducted to demonstrate compliance with the allowable hourly OC mass emission rate and the capture and control efficiencies for OC.

c. Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A shall be employed to demonstrate compliance with the allowable mass emission rate for OC. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted while emissions units R009, R011, R018, P008, P018 and P019 are operating at their maximum capacities, unless otherwise specified or approved by the Ohio EPA, Northwest District Office.

V. Testing Requirements (continued)

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

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

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

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

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

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
color booth, equipped with a water curtain system, flash zone, and a regenerative thermal oxidizer (RTO); paint line #3	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the BREEZE AIR ISCST3, v. 2.03 model. The predicted 1-hour maximum ground-level concentration from the use of the BREEZE AIR ISCST3, v. 2.03 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):

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

Pollutant: ethyl benzene
TLV (ug/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 0.37
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 43.7
MAGLC (ug/m3): 10,333.00

Pollutant: methyl ethyl ketone
TLV (ug/m3): 590
Maximum Hourly Emission Rate (lbs/hr): 2.54
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 43.7
MAGLC (ug/m3): 14,048.00

Pollutant: xylene
TLV (ug/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 0.06
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 43.7
MAGLC (ug/m3): 10,333.00

Pollutant: toluene
TLV (ug/m3): 188
Maximum Hourly Emission Rate (lbs/hr): 0.26
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 43.7
MAGLC (ug/m3): 4,476.00

Pollutant: methanol
TLV (ug/m3): 262
Maximum Hourly Emission Rate (lbs/hr): 0.01
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 43.7
MAGLC (ug/m3): 6,238.00

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

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

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

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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