



Environmental Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

1/19/2011

Ms. Rae Presz  
SAINT GOBAIN PERFORMANCE PLASTICS  
335 N. Diamond Street  
Ravenna, OH 44266

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1667060007  
Permit Number: P0106947  
Permit Type: Administrative Modification  
County: Portage

Certified Mail

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

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at [www.epa.ohio.gov/dapc/permitsurvey.aspx](http://www.epa.ohio.gov/dapc/permitsurvey.aspx) and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. 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, OH 43215

If you have any questions, please contact Akron Regional Air Quality Management District at (330)375-2480 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPC Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc), by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: ARAQMD





## Response to Comments

Response to comments for: Permit-To-Install and Operate

Facility ID:	1667060007
Facility Name:	SAINT GOBAIN PERFORMANCE PLASTICS
Facility Description:	Plastic Products.
Facility Address:	335 N DIAMOND ST Ravenna, OH 44266 Portage County
Permit #:	P0106947, Administrative Modification
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Record Courier on 12/12/2010. The comment period ended on 01/11/2011.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

- a. No comments received.





**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
SAINT GOBAIN PERFORMANCE PLASTICS**

Facility ID: 1667060007  
Permit Number: P0106947  
Permit Type: Administrative Modification  
Issued: 1/19/2011  
Effective: 1/19/2011  
Expiration: 5/18/2014





Division of Air Pollution Control
Permit-to-Install and Operate
for
SAINT GOBAIN PERFORMANCE PLASTICS

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## Authorization

Facility ID: 1667060007

Application Number(s): M0000912

Permit Number: P0106947

Permit Description: Administrative modification of PTIO P0104587 issued final on 5/18/2009 to reduce the volatile organic compounds emission limitation to below 10 tons in order to avoid record keeping for the hazardous air pollutants.

Permit Type: Administrative Modification

Permit Fee: \$200.00

Issue Date: 1/19/2011

Effective Date: 1/19/2011

Expiration Date: 5/18/2014

Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

SAINT GOBAIN PERFORMANCE PLASTICS  
335 N DIAMOND ST  
Ravenna, OH 44266

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

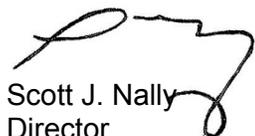
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Akron Regional Air Quality Management District  
146 South High Street, Room 904  
Akron, OH 44308  
(330)375-2480

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Scott J. Nally  
Director



Authorization (continued)

Permit Number: P0106947
Permit Description: Administrative modification of PTIO P0104587 issued final on 5/18/2009 to reduce the volatile organic compounds emission limitation to below 10 tons in order to avoid record keeping for the hazardous air pollutants.

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

Group Name: Spray Booths

Table with 2 columns: Emissions Unit ID and details. Rows include R007 and R008 with associated equipment IDs, superseded permit numbers, and general permit categories.

## **A. Standard Terms and Conditions**

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

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

**2. Who is responsible for complying with this permit?**

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

**3. What records must I keep under this permit?**

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

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

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

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

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

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

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

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

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

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

**7. What reports must I submit under this permit?**

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

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

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

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

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

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

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Akron Regional Air Quality Management District in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that

exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred. If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

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

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

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

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

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

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

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

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or

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

modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

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

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

## **B. Facility-Wide Terms and Conditions**

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) 2, 3, 4, 5, and 6.
2. The emissions of volatile organic compounds (VOC) from emissions units R001, R002, R003, R004, R006, R007, and R008, combined, shall not exceed 9.95 tons per year based upon a rolling, 12-month summation of the monthly emissions.
3. In order to demonstrate compliance with the emission limitation in 2. above, the permittee shall collect and record the following information each month for emissions units R001, R002, R003, R004, R006, R007, and R008, combined:
  - a) the name and identification number of each coating and coating additive (i.e., activator, accelerator, catalyst, curing agent, thinner, etc.) employed;
  - b) the VOC content of each coating and coating additive, in pounds per gallon or weight fraction;
  - c) the number of gallons or pounds of each coating and coating additive employed;
  - d) the name and identification of each cleanup material employed;
  - e) the VOC content of each cleanup material, in pounds per gallon or weight fraction;
  - f) the number of gallons or pounds of each cleanup material employed;
  - g) the total VOC, in tons, from all the coatings, coating additives, and cleanup materials employed; and
  - h) the rolling, 12-month VOC emissions, in tons, from all the coatings, coating additives, and cleanup materials employed.
4. The permittee shall submit quarterly deviation (excursion) reports that identify:
  - a) all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - (1) all exceedances of the rolling, 12-month emission limitation for VOC, for emissions units R001, R002, R003, R004, R006, R007, and R008, combined.

- b) the probable cause of each deviation (excursion);
- c) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d) the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

5. Compliance with the emissions limitation(s) in 2. above shall be determined in accordance with the following method(s):

- a) Emission Limitation:

The emissions of VOC from emissions units R001, R002, R003, R004, R006, R007, and R008, combined, shall not exceed 9.95 tons per year based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be demonstrated based on the record keeping requirements established in 3 above.

6. All organic hazardous air pollutants (HAPs) are VOCs. Also, the potential to emit of any metal HAP (chromium) is below 10 tons per year (0.18 ton/yr)<sup>1</sup>. Furthermore, the potential to emit for combined HAPs is below 25 tons per year.<sup>2</sup>

<sup>1</sup>The potential to emit for metal HAPs is based on multiplying a maximum chromium content of 0.35 lb/gallon of primer by a dry filter control efficiency of 98% and by a maximum annual primer usage of 52,568 gallons/year<sup>3</sup>, and then dividing by 2000 lbs/ton.

<sup>2</sup>The potential to emit for the combined HAPs will be 10.13 ton/yr (9.95 + 0.18)

<sup>3</sup>based on a maximum primer usage of 1 gallon/hr and 8760 hours of operation/yr for each of the six spray booths

## **C. Emissions Unit Terms and Conditions**

**1. Emissions Unit Group - Spray Booths: R007, R008,**

EU ID	Operations, Property and/or Equipment Description
R007	Plastic Parts Coating Operation - Spray Paint Booth #5
R008	Plastic Parts Coating Operation - Spray Paint Booth #6

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
- (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
- a. b)(1)m., d)(7), d)(8), d)(9), d)(10), and e)(2).
- (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
- a. b)(1)f.
- b) Applicable Emissions Limitations and/or Control Requirements
- (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	For emissions unit R007 and R008: The emissions of volatile organic compounds (VOC) from each emissions unit shall not exceed 6.0 pounds per hour.  See b)(2)(f) below.
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	For the natural gas-fired oven for each emissions unit listed above, see b)(2)a. below.
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	The emissions from the natural gas-fired oven for each emissions unit listed above shall not exceed the following:  0.15 pound of nitrogen oxides (NO <sub>x</sub> ) per hour and 0.66 ton of NO <sub>x</sub> per year;  0.12 pound of carbon monoxide (CO) per hour and 0.53 ton of CO per year;

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		0.001 pound of sulfur dioxide (SO <sub>2</sub> ) per hour and 0.004 ton of SO <sub>2</sub> per year; and  0.03 pound of particulate emissions (PE) per hour and 0.13 ton of PE per year.
d.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	For emissions unit R007 and R008: The PE from the spray booth for each emissions unit listed above shall not exceed 0.37 pound per hour and 1.62 tons per year.  See b)(2)g. below.
e.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b. below.
f.	OAC rule 3745-31-05(D) (Synthetic Minor to Avoid Title V and MACT applicability under 40 CFR Part 63, Subpart GG)	See 2 through 6 of Section B – Facility-Wide Terms and Conditions.
g.	OAC rule 3745-17-07(A)	For the natural gas-fired oven for each emissions unit listed above, the visible PE from any stack shall not exceed twenty per cent opacity, as a six-minute average, except as provided by rule.
h.	OAC rule 3745-17-07(A)	For each spray booth for each emissions unit listed above, the visible PE from any stack shall not exceed twenty per cent opacity, as a six-minute average, except as provided by rule.
i.	OAC rule 3745-17-10(B)	For the natural gas-fired oven for each emissions unit listed above, the maximum allowable amount of PE shall be 0.020 pound per million Btu of actual heat input.
j.	OAC rule 3745-17-11(C)	See b)(2)c. and b)(2)d. below.
k.	OAC rule 3745-21-07(G)	When employing, applying, evaporating, or drying any photochemically reactive material, or substance containing such photochemically reactive material, the permittee shall not discharge more than 40 pounds of organic material into the atmosphere in any one day, nor more than 8 pounds of organic material in any one hour.  See b)(2)e. below.
l.	OAC rule 3745-21-19	The facility is excluded from the requirements of this rule because the facility has a potential to emit for VOC of

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		less than 25.0 tons per year for all operations combined where aerospace components and vehicles are cleaned or coated.
m.	OAC rule 3745-114-01 ORC 3704.03(F)(4)	See d)(7) through d)(10) below.

(2) Additional Terms and Conditions

- a. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the uncontrolled NO<sub>x</sub>, CO, PE, and SO<sub>2</sub> from natural gas-fired oven associated with each of the air contaminant source listed above since the uncontrolled potentials to emit for NO<sub>x</sub>, CO, PE, and SO<sub>2</sub> are less than ten tons per year.

- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

Federally enforceable permit-to-install and operate (FEPTIO) P0106947 for the air contaminant sources listed above takes into account the use of a passive dry filter, whenever these air contaminant sources are in operation, with a minimum control efficiency of 90%, by weight for PE, as a voluntary restriction as proposed by the permittee for the purpose of avoiding BAT requirements under OAC rule 3745-31-05(A)(3).

- c. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes; however, until the U.S. EPA approves the revision to OAC rule 3745-17-11, the requirement to comply with OAC rules 3745-17-07(A) and 3745-17-11(B) provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(1)d., b)(1)h., f)(1)c., f)(1)k, and f)(1)l.

On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.

- d. The permittee shall install and operate a dry particulate filter system whenever either emissions unit listed above is in operation.
- e. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of

the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The requirements of amended OAC rule 3745-21-07 do not apply to emissions units that are installed after February 18, 2008. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(1)k., d)(6), e)(1) and f)(1)d.

- f. The hourly VOC emission limitation is based on each emissions unit's potential to emit. Therefore, no monitoring, record keeping or reporting is required to demonstrate compliance with this emission limitation.
- g. The hourly and annual PE limitations are based on each emissions unit's potential to emit. Therefore, no monitoring, record keeping or reporting is required to demonstrate compliance with these emission limitations.

c) Operational Restrictions

- (1) The permittee shall install, operate, and maintain a dry particulate filter system for the surface coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The dry particulate filter shall be employed during all periods of coating application to control particulate emissions.
- (2) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (2) The permittee shall conduct periodic inspections of the dry particulate filter for the emissions units listed above to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (3) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter for the emissions units listed above while the emissions unit is shut down and perform

any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

- (4) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system for the emissions units listed above and shall maintain the following information:
- a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of the person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (5) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when either emissions unit listed above was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- (6) The permittee shall collect and record the following information for each day for each emissions unit listed above:
- a. the company identification for each coating and photochemically reactive cleanup material employed;
  - b. the number of gallons of each coating and photochemically reactive cleanup material employed;
  - c. the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;
  - d. the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;
  - e. the total number of hours the emissions unit was in operation; and
  - f. the average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).

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

(7) The FEPTIO application for these emissions units, R007 and R008, was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
  - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
  - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

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

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

Toxic Contaminant: Toluene

TLV (mg/m<sup>3</sup>): 75

Maximum Hourly Emission Rate (lbs/hr): 4.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 273

MAGLC (ug/m3): 1794

Toxic Contaminant: Xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 9.32

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 607

MAGLC (ug/m3): 10,333

Toxic Contaminant: Methyl Isobutyl Ketone

TLV (mg/m3): 205

Maximum Hourly Emission Rate (lbs/hr): 3.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 195

MAGLC (ug/m3): 4875

Toxic Contaminant: Ethylene Glycol Mono-ethyl Ether Acetate

TLV (mg/m3): 27

Maximum Hourly Emission Rate (lbs/hr): 0.32

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 21

MAGLC (ug/m3): 643

The permittee, has demonstrated that emissions of toluene, xylene, methyl ethyl ketone, and ethylene glycol mono-ethyl ether acetate, from emissions units R007 and R008, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

- (8) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

- (9) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
  - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
  - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
  - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
  - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- (10) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

- (1) The permittee shall identify in the annual permit evaluation report (PER) the following information concerning the hourly and daily organic compound emissions during the 12-month reporting period for the emissions units listed above:
  - a. an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
  - b. an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
- (2) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual PER. If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
- (3) Annual PER forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in b)(1) above shall be determined in accordance with the following method(s):
  - a. Emission Limitation:

For emissions unit R007 and R008: The emissions of VOC from each emissions unit shall not exceed 6.0 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation above shall be demonstrated by multiplying the VOC content of the worst-case coating, as applied, in pounds of VOC per gallon coating by the maximum hourly coating usage (1 gallon per hour) plus multiplying 0.0054 pound of VOC per MM Btu of heat input\* by the maximum hourly heat input for the drying oven (1.5 MM Btu/hour).

If required, the permittee shall demonstrate compliance with the hourly limitation in accordance with Methods 1-4 and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

\*AP-42 emission factor from Table 1.4-2 dated 7/98 convert from lb/10<sup>6</sup> standard cubic feet (scf) to lb/MM Btu, divide by 1,020.

b. Emission Limitations:

For the natural gas-fired oven for each emissions unit listed above, the visible PE from any stack shall not exceed twenty per cent opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the visible PE limitation for any stack from the emissions units listed above shall be demonstrated in accordance with the test method and procedures specified in OAC rule 3745-17-03(B)(1).

c. Emission Limitations:

For each spray booth for each emissions unit listed above, the visible PE from any stack shall not exceed twenty per cent opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the visible PE limitation for any stack from the emissions units listed above shall be demonstrated in accordance with the test method and procedures specified in OAC rule 3745-17-03(B)(1).

d. Emission Limitations:

When employing, applying, evaporating, or drying any photochemically reactive material, or substance containing such photochemically reactive material, the permittee shall not discharge more than 40 pounds of organic material into the atmosphere in any one day, nor more than 8 pounds of organic material in any one hour.

Applicable Compliance Method:

Compliance with the hourly and daily allowable organic material emission limitations above shall be demonstrated through the record keeping requirements established in d)(6) above.

e. Emission Limitation:

For the natural gas-fired oven for each emissions unit listed above, the maximum allowable amount of PE shall be 0.020 pound per million Btu of actual heat input.

Applicable Compliance Method:

Compliance with the allowable PE limitation above shall be demonstrated by dividing the AP-42 emission factor 7.6 pounds of PE per million standard cubic feet (scf) of natural gas fire\* by 1020 Btu per scf.

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

\*AP-42 emission factor from Table 1.4-2 dated 7/98.

f. Emission Limitation:

0.15 pound of NO<sub>x</sub> per hour

Applicable Compliance Method:

Compliance with the hourly allowable NO<sub>x</sub> emission limitation above shall be demonstrated by multiplying the NO<sub>x</sub> emission factor of 100 pounds of NO<sub>x</sub> emissions per million cubic feet of natural gas fired\* by the maximum hourly natural gas usage.

\*The NO<sub>x</sub> emission factor is from AP-42, 5th edition, Table 1.4-1, dated 7/98

g. Emission Limitation:

0.12 pound of CO per hour

Applicable Compliance Method:

Compliance with the hourly allowable CO emission limitation above shall be demonstrated by multiplying the CO emission factor of 84 pounds of CO emissions per million cubic feet of natural gas fired\* by the maximum hourly natural gas usage.

\*The CO emission factor is from AP-42, 5th edition, Table 1.4-1, dated 7/98

h. Emission Limitation:

0.03 pound of PE per hour

Applicable Compliance Method:

Compliance with the hourly allowable PE limitation above shall be demonstrated by multiplying the PE factor of 7.6 pounds of PE per million cubic feet of natural gas fired\* by the maximum hourly natural gas usage.

\*The PE factor is from AP-42, 5th edition, Table 1.4-2, dated 7/98

i. Emission Limitation:

0.001 pound of SO<sub>2</sub> per hour

Applicable Compliance Method:

Compliance with the hourly allowable SO<sub>2</sub> emission limitation above shall be demonstrated by multiplying the SO<sub>2</sub> emission factor of 0.6 pound of SO<sub>2</sub>

emissions per million cubic feet of natural gas fired\* by the maximum hourly natural gas usage.

\*The SO<sub>2</sub> emission factor is from AP-42, 5th edition, Table 1.4-2, dated 7/98

j. Emission Limitations

0.66 ton of NO<sub>x</sub> per year

0.53 ton of CO per year

0.13 ton of PE per year

0.004 ton of SO<sub>2</sub> per year

Applicable Compliance Method:

Compliance with the annual allowable emission limitations above shall be demonstrated by multiplying the hourly allowable emission limitation by 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitations are maintained, compliance with the annual allowable emission limitations shall be assumed.

k. Emission Limitation:

For emissions unit R007 and R008: The PE from the spray booth for each emissions unit listed above shall not exceed 0.37 pound per hour.

Applicable Compliance Method:

Compliance with the hourly allowable PE limitation above shall be demonstrated using the following equation:

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

where:

E = PE rate (pounds/hour).

TE = Transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used.

CE = Control efficiency of the control equipment (filters).

If required, compliance with the hourly allowable PE limitation shall be demonstrated by emission tests performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

l. Emission Limitation:

For emissions unit R007 and R008: The PE from the spray booth for each emissions unit listed above shall not exceed 1.62 tons per year.

Applicable Compliance Method:

Compliance with the annual allowable PE limitation above shall be demonstrated by multiplying the hourly allowable PE limitation by 8760 hours per year, and then dividing by 2000 pounds per ton. Therefore, as long as compliance with the hourly allowable emission limitation is maintained, compliance with the annual allowable emission limitation shall be assumed.

g) Miscellaneous Requirements

- (1) None.