

Facility ID: 0247040179 Issuance type: Title V Final Permit

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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## Part II - Specific Facility Terms and Conditions

### a State and Federally Enforceable Section

1. None

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### b State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:
  - P002-Nitric acid strip line/burnishing line
  - P003-Chrome evaporator
  - P004-Nickel evaporator
  - P005-Wastewater treatment
  - B011-Boiler #1
  - B012-Boiler #2

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within a Permit to Install for the emissions unit.
2. The facility is hereby notified that this permit and all Agency records covering the operation of this permitted source are subject to public disclosure in accordance with OAC rule 3745-49-03.

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- [Go to Part III for Emissions Unit P001](#)
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Part III - Terms and Conditions for Emissions Units

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Facility ID: 0247040179 Emissions Unit ID: L001 Issuance type: Title V Final Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
Open top vapor degreaser using perchloroethylene	40 CFR Part 63 Subpart T  OAC rule 3745-21-09(O)  OAC rule 3745-31-05(A)(3) PTI No. 02-3288	See A.I.2.a, A.I.2.b, A.I.2.c, and A.I.2.d below.  In accordance with paragraph (O)(6)(b) of OAC rule 3745-21-09, the requirements of OAC rule 3745-21-09 (O)(3) shall not apply to this emissions unit. See A.I.2.e below.  OC emissions shall not exceed 99.0 tons per year.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(O).  The requirements established pursuant to this rule are less stringent than the requirements of 40 CFR Part 63, Subpart T.

2. Additional Terms and Conditions

- a. The permittee shall ensure that the chilled air blanket temperature (in degrees Fahrenheit or Celsius), measured at the center of the air blanket, is no greater than 30 percent of the solvent's boiling point.
- b. The permittee shall comply with the following requirements:
  - i. ensure that the temperature of the solvent vapor at the center of the superheated vapor zone is at least 10 degrees Fahrenheit above the solvent's boiling point;
  - ii. ensure that the manufacturer's specifications for determining the minimum proper dwell time within the superheated vapor system is followed; and
  - iii. ensure that parts remain within the superheated vapor for at least a minimum proper dwell time.
- c. The permittee shall comply with the following requirements:
  - i. ensure that the cover opens only for part entrance and removal and completely covers the cleaning machine openings when closed; and
  - ii. ensure that the working-mode cover is maintained free of cracks, holes, and other defects.
- d. The permittee shall ensure that the solvent cleaning machine conforms to the following design requirements:
  - i. Use of an idling and downtime mode cover that shall be in place during the idling mode, and during the downtime mode unless either the solvent has been removed from the machine or maintenance or monitoring is being performed that requires the cover(s) to not be in place. The cover must be able to be readily opened or closed, must completely cover the cleaning machine openings when in place, and must be free of cracks, holes, and other defects.

- ii. The solvent cleaning machine shall have a freeboard ratio of 1.0 or greater.
- d.
  - iii. The solvent cleaning machine shall have an automated parts handling system capable of moving parts or parts baskets at a speed of 3.4 meters per minute (11 feet per minute) or less from the initial loading of parts through removal of cleaned parts.
  - iv. The solvent cleaning machine shall be equipped with a device that shuts off the sump heat if the sump liquid solvent level drops to the sump heater coils.
  - v. The solvent cleaning machine shall be equipped with a vapor level control device that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser.
  - vi. The solvent cleaning machine shall have a primary condenser.
- e. This rule citation reflects the new exemption added to OAC rule 3745-21-09 (O) for solvent metal cleaning operations subject to federal MACT standards under 40 CFR, Subpart T, provided the requirements of Subpart T are specified in the terms and conditions. The revised rule containing the exemption was adopted by the Director of Ohio EPA in May 1999. The USEPA has agreed to consider the rule citation as federally enforceable during the time from the effective date of this permit to the effective date of USEPA approval of the rule citation as a revision to the Ohio SIP for ozone.

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#### II. Operational Restrictions

- 1. The permittee shall meet all of the following required work and operational practices:
  - a. control air disturbances across the solvent cleaning machine opening(s) by ensuring that the cover(s) to the solvent cleaning machine shall be in place during the idling mode and during the downtime mode unless either the solvent has been removed from the machine or maintenance or monitoring is being performed that requires the cover(s) to not be in place;
  - b. the parts basket or the parts being cleaned in the solvent cleaning machine shall not occupy more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meters per minute (3 feet per minute) or less;
  - c. any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air (i.e., a baffled or enclosed area of the solvent cleaning machine);
  - d. parts shall be orientated so that the solvent drains from them freely (parts having cavities or blind holes must be tipped or rotated before being removed from the solvent cleaning machine unless an equally effective approach has been approved by the Ohio EPA, NEDO);
  - e. parts baskets or parts shall not be removed from the solvent cleaning machine until dripping has stopped;
  - f. during startup of the solvent cleaning machine, the primary condensers shall be turned on before the sump heater;
  - g. during shutdown of the solvent cleaning machine, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off;
  - h. when solvent is added or drained from the solvent cleaning machine, the solvent shall be transferred using threaded or other leakproof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface;
  - i. the solvent cleaning machine and its associated controls shall be maintained as recommended by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated to the satisfaction of the Ohio EPA NEDO to achieve the same or better results as those recommended by the manufacturer;
  - j. the permittee shall complete and pass the applicable sections of the test of solvent cleaning operating procedures in 40 CFR part 63, Appendix B if requested during an inspection by the Ohio EPA NEDO;
  - k. waste solvent, still bottoms, and sump bottoms shall be collected and stored in closed containers. The closed containers may contain a device that would allow pressure relief, but would not allow liquid solvent to drain from the container; and
  - l. sponges, fabric, wood, and paper products shall not be cleaned in this emissions unit.

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#### III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall monitor the hoist speed as described below:
  - a. The permittee shall determine the hoist speed by measuring the time it takes for the hoist to travel a measured distance. The speed is equal to the distance in meters divided by the time in minutes (meters per minute).

- b. The permittee shall conduct monthly monitoring of the hoist speed. If after the first year of monitoring no exceedances of the hoist speed are measured, the permittee may begin monitoring the hoist speed quarterly.
  - c. If an exceedance of the hoist speed occurs during quarterly monitoring, the permittee shall return to a monthly monitoring frequency until another year of compliance without an exceedance is demonstrated.
  - d. If the permittee can demonstrate to the satisfaction of the Ohio EPA NEDO in the initial compliance report that the hoist speed cannot exceed a speed of 3.4 meters per minute (11 feet per minute), the required monitoring frequency is quarterly, including the first year of compliance.
- 2. The permittee shall maintain the following records in written or electronic form for the lifetime of the solvent cleaning machine:
  - a. owner's manuals, or if not available, written maintenance and operating procedures for the solvent cleaning machine and control equipment;
  - b. the date of installation for the solvent cleaning machine and all of its control devices. If the exact date for the installation is not known, a letter certifying that the cleaning machine and its control devices were installed prior to, or on, November 29, 1993, or after November 29, 1993, may be substituted; and
  - c. records of the halogenated HAP solvent content for the solvent used in the solvent cleaning machine.
- 3. The permittee shall maintain the following records in written or electronic form for a period of five years for the solvent cleaning machine:
  - a. the results of control device monitoring required in this section of the permit;
  - b. information on the actions taken to comply with 40 CFR 63.463(e) and (f), including records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to acceptable levels;
  - c. estimates of annual perchloroethylene consumption for the solvent cleaning machine; and
  - d. estimates of annual perchloroethylene waste removed from the solvent cleaning machine.
- 4. The permittee shall conduct monitoring and record the results on a weekly basis for the freeboard refrigeration device by using a thermometer or thermocouple to measure the temperature at the center of the air blanket during the idling mode.
- 5. The permittee shall conduct monitoring and record the results on a weekly basis for the superheated vapor system by using a thermometer or thermocouple to measure the temperature at the center of the superheated vapor zone while the solvent cleaning machine is in the idling mode.
- 6. The permittee shall conduct monitoring and record the results on a monthly basis for the working mode cover by conducting a visual inspection to determine if the cover is opening and closing properly, completely covers the cleaning machine openings when closed, and is free of cracks, holes, and other defects.
- 7. The permittee shall maintain an annual record which lists the name of each degreasing solvent utilized, the number of gallons used in each degreasing unit and the density (pounds per gallon) of each solvent. The permittee shall also record the amount of waste solvent sent off site to a waste treatment facility (TSDF).

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#### IV. Reporting Requirements

- 1. The permittee shall submit an initial notification report as soon as practicable before the construction or reconstruction is planned to commence. This report shall include all of the information required in 40 CFR 63.5(d)(1) of Subpart A, with the following revisions and additions:
  - a. The report shall include a brief description of the solvent cleaning machine type (batch vapor, batch cold, vapor in-line, or cold in-line), solvent/air interface area, and existing controls.
  - b. The report shall include the anticipated compliance approach for the solvent cleaning machine.
  - c. The report shall include an estimate of the perchloroethylene consumption for the solvent cleaning machine in lieu of the requirements of 40 CFR 63.5(d)(1)(ii)(H), Subpart A.
- 2. The permittee shall submit an annual report by February 1 of each year for the preceding year. Each annual report shall contain the following:
  - a. a signed statement from the facility owner or the owner's designee stating that, "All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required pursuant to 40 CFR Part 60.463(d)(10)"; and
  - b. an estimate of solvent consumption during the reporting period.
- 3. The permittee shall submit an exceedance report on a semiannual basis. If the temperature of the chilled air blanket, measured at the center of the air blanket, was greater than 30% of the solvent's boiling point and no correction was made within 15 days of detection, the permittee shall begin to submit a quarterly report until such time that the permittee requests and receives approval of a less frequent reporting frequency from the Ohio EPA Northeast District Office. The permittee may receive approval of less frequent reporting if the following conditions are met: (1) The emissions unit has demonstrated a full year of compliance without an exceedance, (2) the permittee continues to comply with all relevant recordkeeping and monitoring requirements specified in 40 CFR 63.1, General Provisions, and (3) the Ohio EPA Northeast

District Office does not object to a reduced frequency of reporting for the affected emissions unit as provided in paragraph (e)(3)(iii) of Subpart A, 40 CFR 63.1, General Provisions. Each exceedance report shall be delivered or post marked by the 30th day following the reporting period. Each exceedance report shall contain the following:

- a. the reason and a description of the exceedance and action(s) taken to comply with 40 CFR 63.463 (e) and (f) including written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to acceptable level; and
  - b. if no exceedance has occurred, a statement to that effect shall be submitted.
4. The permittee shall submit an exceedance report on a semiannual basis. If the cover, when closed, did not completely cover the cleaning machine openings or the cover was open at times other than for parts entrance or removal and/or the cover had cracks, holes, or other defects and no correction was made within 15 days of detection, the permittee shall begin to submit a quarterly report until such time that the permittee requests and receives approval of a less frequent reporting frequency from the Ohio EPA Northeast District Office. The permittee may receive approval of less frequent reporting if the following conditions are met: (1) The emissions unit has demonstrated a full year of compliance without an exceedance, (2) the permittee continues to comply with all relevant recordkeeping and monitoring requirements specified in 40 CFR 63.1, General Provisions, and (3) the Ohio EPA Northeast District Office does not object to a reduced frequency of reporting for the affected emissions unit as provided in paragraph (e)(3)(iii) of Subpart A, 40 CFR 63.1, General Provisions. Each exceedance report shall be delivered or post marked by the 30th day following the reporting period. Each exceedance report shall contain the following:
- a. the reason and a description of the exceedance and action(s) taken to comply with 40 CFR 63.463 (e) and (f) including written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to acceptable level; and
  - b. if no exceedance has occurred, a statement to that effect shall be submitted.
5. The permittee shall submit an exceedance report on a semiannual basis. If the manufacturer's specification for determining the minimum dwell time within the superheated vapor system was not followed and/or parts did not remain within the vapor zone for at least the minimum proper dwell time and/or if the temperature of the solvent vapor at the center of the superheated vapor zone was less than 10 degrees Fahrenheit above the solvent's boiling point and no correction was made within 15 days of detection, the permittee shall begin to submit a quarterly report until such time that the permittee requests and receives approval of a less frequent reporting frequency from the Ohio EPA Northeast District Office. The permittee may receive approval of less frequent reporting if the following conditions are met: (1) The emissions unit has demonstrated a full year of compliance without an exceedance, (2) the permittee continues to comply with all relevant recordkeeping and monitoring requirements specified in 40 CFR 63.1, General Provisions, and (3) the Ohio EPA Northeast District Office does not object to a reduced frequency of reporting for the affected emissions unit as provided in paragraph (e)(3)(iii) of Subpart A, 40 CFR 63.1, General Provisions. Each exceedance report shall be delivered or post marked by the 30th day following the reporting period. Each exceedance report shall contain the following:
- a. the reason and a description of the exceedance and action(s) taken to comply with 40 CFR 63.463 (e) and (f) including written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to acceptable level; and
  - b. if no exceedance has occurred, a statement to that effect shall be submitted.
6. The permittee shall submit an annual report which summarizes the annual total organic compound emissions as calculated according to the testing requirements of this permit. This report shall be submitted to the Ohio EPA, Northeast District Office by February 15 of each year and shall cover the operations of this emissions unit for the previous calendar year.

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#### V. Testing Requirements

1. The permittee shall determine the facility's potential to emit (PTE) from all solvent cleaning operations. A facility's total PTE is the sum of the HAP emissions from all solvent cleaning operations plus all HAP emissions from other emissions units from within the facility. The potential to emit shall be determined in accordance with the following procedures:

Determine the potential to emit for each individual solvent cleaning machine using the following equation:

$$PTE_i = H_i \times W_i \times SA_i$$

where:

$PTE_i$  = the potential to emit for the solvent cleaning machine  $i$  (kilograms solvent per year)

$H_i$  = hours of operation for solvent cleaning machine  $i$  (hours per year).

= 8760 hours per year, unless otherwise restricted by a federally enforceable requirement.

$W_i$  = the working mode uncontrolled emission rate (kilograms per square meter per hour).

= 1.95 kilograms per square meter per hour for batch vapor and cold cleaning machines.

= 1.12 kilograms per square meter per hour for in-line cleaning machines.

SALi = solvent/air interface area of solvent cleaning machine i (square meters). Section 63.461 defines the solvent/air interface area for those machines that have a solvent/air interface.

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

Emission Limitation:

OC emissions shall not exceed 99.0 tons per year.

Applicable Compliance Method:

To determine the actual organic compound emission rate, the following equation shall be used:

$$E = (Ls-Lw) \times D/2000$$

E = organic compound emissions rate (tons/year)

Ls = liquid volume of cleaning solvent employed each year (gallons)

Lw = liquid volume of cleaning solvent sent off-site as waste (gallons)

D = density of cleaning solvent (pounds/gallon)

If more than one type of cleaning solvent is employed, the above equation shall be used for each cleaning solvent. The total annual organic compound emissions rate shall be determined by the summation of the annual organic compound emission rates for all cleaning solvents.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0247040179 Emissions Unit ID: L001 Issuance type: Title V Final Permit

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
2. <b>Additional Terms and Conditions</b>			
1.	None		

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 0247040179 Emissions Unit ID: P001 Issuance type: Title V Final Permit

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
Decorative chromium plating line: acid cleaning tanks, alkaline cleaning tanks, nickel plating tanks, chromium plating tanks	40 CFR Part 63 Subpart N  OAC rule 3745-17-07(A)(1)	See A.I.2.a below.  Visible particulate matter emissions shall not exceed 20 percent opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 0.551 pound per hour.

2. **Additional Terms and Conditions**

- a. The permittee shall control chromium emissions discharged to the atmosphere by not allowing the surface tension of the electroplating bath to exceed 45 dynes per centimeter (3.1 x 10E-03 pound-force per foot) at any time during operation of the tank.

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II. **Operational Restrictions**

- 1. At all times, including periods of startup, shutdown, and malfunction, the permittee shall operate and maintain any chromium electroplating or anodizing tank, including associated air pollution control devices and monitoring equipment, in a manner consistent with the operation and maintenance plan required by these terms and conditions.
- 2. Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the operation and maintenance plan.
- 3. Determination of whether acceptable operation and maintenance procedures are being used will be based on information available to the Ohio EPA Northeast District Office, which may include, but is not limited to,

monitoring results; review of the operation and maintenance plan, procedures, and records; and inspection of the emissions unit. Based on this information, the Ohio EPA Northeast District Office may require that the permittee make changes to the operation and maintenance plan if that plan:

- a. does not address a malfunction that has occurred;
  - b. fails to provide for the operation of the emissions units, the air pollution control techniques, or the control system and process monitoring equipment during a malfunction in a manner consistent with good air pollution practices; or
  - c. does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control techniques, or monitoring equipment as quickly as practicable.
4. The permittee shall maintain an operation and maintenance plan. The plan shall include the following elements:
- a. The plan shall specify the operation and maintenance criteria for the affected emissions unit, the add-on air pollution control device (if such a device is used to comply with the emissions limits), and the process and control system monitoring equipment, and shall include a standardized checklist to document the operation and maintenance of the equipment.
  - b. If a stalagmometer is used for monitoring, follow the manufacturer's recommendations.
  - c. The plan shall specify procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur.
  - d. The plan shall include a systematic procedure for identifying malfunctions of process equipment, add-on air pollution control devices, and process and control system monitoring equipment, and for implementing corrective actions to address such malfunctions.
  - e. If the operation and maintenance plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the permittee shall revise the operation and maintenance plan within 45 days after such an event occurs.
  - f. If actions taken by the permittee during periods of malfunction are inconsistent with the procedures specified in the operation and maintenance plan, the permittee shall record the actions taken for that event and shall report such actions within 2 working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within 7 working days after the end of the event, unless the permittee makes alternative reporting arrangements, in advance, with the Ohio EPA Northeast District Office.
  - g. The permittee shall keep the written operation and maintenance plan on record after it is developed to be made available for inspection, upon request, by the Ohio EPA Northeast District Office for the life of the emissions unit. If the operation and maintenance plan is revised, the permittee shall keep previous versions of the plan on record to be made available for inspection, upon request, by the Ohio EPA Northeast District Office for a period of five years after each revision to the plan.
  - h. The permittee may use applicable standard operating procedure (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans to meet the operation and maintenance plan requirements as long as the alternative plans meet the requirements.

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### III. Monitoring and/or Record Keeping Requirements

1.
  - a. During an initial performance test, which was required to be completed by July 23, 1996, the permittee shall determine the outlet chromium concentration using the procedures described in the "Testing Requirements" section of this permit to comply with the emission limitation through the use of a wetting agent-type or combination wetting agent-type/foam blanket fume suppressant. The permittee shall establish as the site-specific operating parameter the surface tension of the bath using Method 306B of 40 CFR Part 63, Subpart N, setting the maximum value that corresponds to compliance with the applicable emission limitations. In lieu of establishing the maximum surface tension during the performance test, the owner or operator may accept 45 dynes/cm as the maximum surface tension value that corresponds to compliance with the applicable emission limitation. If this test has not been completed, the permittee shall complete the test within 30 days after the issuance of this permit.
  - b. On and after the date on which the initial performance test is required to be completed under Section 63.7 of 40 CFR Part 63, Subpart A, the permittee shall monitor the surface tension of the electroplating or anodizing bath. Operation of the affected emissions unit at a surface tension greater than the value established during the performance test, or greater than 45 dynes/cm if the permittee is using this value as the maximum surface tension value, shall constitute noncompliance with the standards.
  - c. The surface tension shall be monitored according to the following schedule:
    - i. The surface tension shall be measured once every four hours during operation of the tank with a stalagmometer or a tensiometer as specified in Method 306B of 40 CFR Part 63, Subpart N.
    - ii. The time between monitoring can be increased if there have been no exceedances. The surface tension shall be measured once every four hours of tank operation for the first 40 hours of tank operation after the compliance date. Once there are no exceedances during 40 hours of tank operation, surface tension measurement may be conducted once every 8 hours of tank operation. Once there are no exceedances during 40 hours of tank operation, surface tension measurement may be conducted once every 40 hours of tank operation on an ongoing basis, until an exceedance occurs. The minimum frequency of monitoring allowed is once every 40 hours of tank operation.
    - iii. Once an exceedance occurs, as indicated through surface tension monitoring, the original monitoring

schedule of once every four hours must be resumed. A subsequent decrease in frequency shall follow the schedule in paragraph (ii) above.

- iv. Once a bath solution is drained from the affected tank and a new solution added, the original monitoring schedule of once every four hours must be resumed, with a decrease in monitoring frequency allowed as in paragraph (ii) above.
2. The permittee shall fulfill all recordkeeping requirements in the General Provisions to 40 CFR Part 63, according to the applicability of Subpart A.
3. The permittee also shall maintain the following records:
  - a. inspection records for the add-on air pollution control device, if such a device is used, and monitoring equipment, to document that the inspection and maintenance required by the work practice standards of this permit have taken place. The record can take the form of a checklist and should identify the device inspected, the date of inspection, a brief description of the working condition of the device during the inspection, and any actions taken to correct deficiencies found during the inspection;
  - b. records of all maintenance performed on the emissions unit, add-on air pollution control device, and monitoring equipment;
  - c. records of the occurrence, duration, and cause (if known) of each malfunction of process, add-on air pollution control device, and monitoring equipment;
  - d. records of actions taken during periods of malfunction when such actions are inconsistent with the operation and maintenance plan;
  - e. other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the operation and maintenance plan;
  - f. test reports documenting results of all performance tests;
  - g. all measurements as may be necessary to determine the conditions of performance tests;
  - h. records of monitoring data that are used to demonstrate compliance with the standard including the date and time the data are collected;
  - i. the specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during malfunction of the process, add-on air pollution control device, or monitoring equipment;
  - j. the specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during periods other than malfunction of the process, add-on air pollution control device, or monitoring equipment;
  - k. the total process operating time of the emissions unit during the reporting period;
  - l. all documentation supporting the notifications and reports as outlined in the Reporting Requirements of this permit and 63.9 and 63.10 of 40 CFR Part 63, Subpart A; and
  - m. records of the date and time that fume suppressants are added to the electroplating or anodizing bath.
4. All records shall be maintained for a period of five years.

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#### IV. Reporting Requirements

1. The permittee shall fulfill all reporting requirements as outlined in 40 CFR Part 63 Subpart A. These reports shall be made to the Ohio EPA Northeast District Office and shall be sent by U.S. mail, fax or by another courier.
  - a. Submittals sent by U.S. mail shall be postmarked on or before the specified date.
  - b. Submittals sent by other methods shall be received by the Ohio EPA District Office on or before the specified date.
2. The permittee shall submit a summary report annually (unless a request to reduce frequency of ongoing compliance status reports has been approved) to the Ohio EPA Northeast District Office to document the ongoing compliance status of the emissions unit. This report shall include the following:
  - a. the company name and address of the emissions unit;
  - b. an identification of the operating parameter that is monitored for compliance determination;
  - c. the relevant emission limitation for the emissions unit, and the operating parameter value, or range of values, that corresponds to compliance with this emission limitation as specified in the Notification of Compliance Status required by this section;
  - d. the beginning and ending dates of the reporting period;
  - e. the total operating time of the emissions unit during the reporting period;
  - f. a summary of operating parameter values, including the total duration of excess emissions during the reporting period as indicated by those values, the total duration of excess emissions expressed as a

- percent of the total emissions unit operating time during that reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to process upsets, control equipment malfunctions, other known causes, and unknown causes;
- g. a certification by a responsible official that the work practice standards in this permit were followed in accordance with the operation and maintenance plan for the emissions unit;
  - h. if the operation and maintenance plan required by this permit was not followed, an explanation of the reasons for not following the provisions, an assessment of whether any excess emission and/or parameter monitoring exceedances are believed to have occurred, and a copy of the reports required by the work practices in this permit;
  - i. a description of any changes in monitoring, processes, or controls since the last reporting period;
  - j. the name, title, and signature of the responsible official who is certifying the accuracy of the report; and
  - k. the date of the report.
3. The permittee shall submit semiannual reports if the following conditions are met:
- a. the total duration of excess emissions is one percent or greater of the total operating time for the reporting period; and
  - b. the total duration of malfunctions of the add-on air pollution control device monitoring equipment is 5 percent or greater of the total operating time.
4. Once the permittee reports an exceedance, ongoing compliance status reports shall be submitted semiannually until a request to reduce reporting frequency is approved.
5. The Ohio EPA Northeast District Office may determine on a case- by-case basis that the summary report shall be completed more frequently and submitted, or that the annual report shall be submitted instead of being retained on site, if these measures are necessary to accurately assess the compliance status of the emissions unit.
6. The permittee who is required to submit ongoing compliance status reports on a semiannual (or more frequent) basis, or is required to submit its annual report instead retaining it on site, may reduce the frequency of reporting to annual and/or be allowed to maintain the annual report on site if all of the following conditions are met:
- a. For 1 full year (e.g., 2 semiannual or 4 quarterly reporting periods), the ongoing compliance status reports demonstrate that the affected emissions unit is in compliance with the relevant emission limit.
  - b. The permittee continues to comply with all applicable recordkeeping and monitoring requirements of 40 CFR Part 63 Subpart A and this permit.
  - c. The Ohio EPA Northeast District Office does not object to a reduced reporting frequency. The frequency of submitting ongoing compliance status reports may be reduced if the following requirements are met :
    - i. The permittee notifies the Ohio EPA Northeast District Office in writing of its intentions to make such a change. The Ohio EPA Northeast District Office may review information concerning the facility's previous performance history during the 5-year recordkeeping period prior to the intended change, or the recordkeeping period since the emissions unit's compliance date, whichever is shorter. Records subject to review include performance test results, monitoring data, and evaluations of the permittee's conformance with emission limitations and work practice standards. If the permittee's request is disapproved, the Ohio EPA Northeast District Office will notify the permittee in writing within 45 days after receiving notice. This notification will specify the grounds on which the disapproval is based. In the absence of a notice of disapproval within 45 days, approval is automatically granted.
    - ii. If monitoring data show that the emissions unit is not in compliance with the relevant emission limit, the frequency of reporting shall revert to semiannual, and the permittee shall state this exceedance in the ongoing compliance status report for the next reporting period. After demonstrating ongoing compliance with the relevant emission limit for another full year, the permittee may again request approval to reduce the reporting frequency.
7. The permittee shall submit a notification of construction or reconstruction as soon as practicable before the construction or reconstruction has commenced to the Ohio EPA Northeast District Office which includes the following:
- a. the permittee's name, title, and address;
  - b. the address (i.e., physical location) or proposed address of the affected emissions unit if different from the permittee's;
  - c. a notification of intention to construct or make any physical or operational changes to an affected emissions unit that may meet or has been determined to meet the criteria for a reconstruction as defined in 40 CFR Part 63.2;
  - d. an identification of 40 CFR Part 63, Subpart N as the basis for the notification;
  - e. the expected commencement and completion dates of the construction or reconstruction;
  - f. the anticipated date of (initial) startup;
  - g. the type of process operation to be performed (hard or decorative chromium electroplating or chromium anodizing);
  - h. a description of the air pollution control technique to be used to control emissions, such as preliminary design drawings and design capacity if an add-on air pollution control device is used; and

- i. an estimate of emissions based on engineering calculations and vendor information on control device efficiency, expressed in units consistent with the emissions limits of 40 CFR Part 63, Subpart N. Calculations of emission estimates should be in sufficient detail to permit assessment of the validity of the calculations.
8. If a reconstruction is to occur, the permittee shall submit as soon as practicable the following information to the Ohio EPA Northeast District Office:
- a. A brief description of the affected emissions unit and the components to be replaced.
  - b. A brief description of the present and proposed emission control technique.
  - c. An estimate of the fixed capital cost of the replacements and of constructing a comparable entirely new emissions unit.
  - d. The estimated life of the affected emissions unit after the replacements.
  - e. A discussion of any economic or technical limitations the emissions unit may have in complying with relevant standards or other requirements after proposed replacements. The discussion shall be sufficiently detailed to demonstrate to the Ohio EPA Northeast District Office's satisfaction that the technical or economic limitations affected the emissions unit's ability to comply with the relevant standard and how they do so.

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V. **Testing Requirements**

1. Method 306B, "Surface Tension Measurement and Recordkeeping for Tanks Used at Decorative Chromium Electroplating and Anodizing Facilities", shall be used to measure the surface tension of electroplating and anodizing baths.
2. All monitoring equipment shall be installed such that representative measurements of emissions or process parameters from the affected emissions unit are obtained. For monitoring equipment purchased from a vendor, verification of the operational status of the monitoring equipment shall include execution of the manufacturer's written specifications or recommendations for installation, operation, and calibration of the system. The surface tension of electroplating and anodizing baths shall be measured using Method 306B. This method should also be followed when wetting agent type or combination wetting agent/foam blanket type fume suppressants are used to control chromium emissions from a hard chromium electroplating tank and surface tension measurements are conducted to demonstrate continuous compliance.
3. Emission Limitation:
 

Visible particulate matter emissions shall not exceed 20 percent opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

Compliance shall be determined by visible emission observations performed in accordance with USEPA Reference Method 9 and the procedures specified in OAC rule 3745-17-03 (B)(1), if required by the Ohio EPA.
4. Emission Limitation:
 

Particulate emissions shall not exceed 0.551 pound per hour.

Applicable Compliance Method:

If required, compliance shall be demonstrated by emission testing in accordance with Method 5 of 40 CFR, Part 60, Appendix A.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0247040179 Emissions Unit ID: P001 Issuance type: Title V Final Permit

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

**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>
<b>2. Additional Terms and Conditions</b>		
1. None		

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**II. Operational Restrictions**

- 1. None

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**III. Monitoring and/or Record Keeping Requirements**

- 1. None

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**IV. Reporting Requirements**

- 1. None

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**V. Testing Requirements**

- 1. None

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**VI. Miscellaneous Requirements**

- 1. None

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**Facility ID: 0247040179 Emissions Unit ID: R001 Issuance type: Title V Final Permit**

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

**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>
Coating booth #1	OAC rule 3745-31-05(A)(3) PTI No. 02-12200	OC emissions shall not exceed 7.3 tons per year, excluding nonphotochemically reactive cleanup materials.  OC emissions from the use of nonphotochemically reactive cleanup materials shall not exceed 0.5 ton per year.  Visible particulate emissions shall not exceed 5 percent opacity as a six-minute average.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).
	OAC rule 3745-21-07(G)(2)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11(B)(1). OC emissions shall not exceed 40 pounds per day, excluding nonphotochemically reactive cleanup materials.
	OAC rule 3745-17-07(A)(1)	OC emissions shall not exceed 8 pounds per hour, excluding nonphotochemically reactive cleanup materials. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 0.551 pound per hour.

2. **Additional Terms and Conditions**

- (a) None

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II. **Operational Restrictions**

1. This emissions unit shall not employ cleanup materials that are photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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III. **Monitoring and/or Record Keeping Requirements**

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #02-12200, issued on October 15, 1998: Section A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permittee shall collect and record the following information on a daily basis for this emissions unit:
  - a. the company identification for each coating employed;
  - b. the company identification of each cleanup material employed and its physical state;
  - c. for each coating and cleanup material, whether or not each material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5);
  - d. the number of gallons of each coating and each cleanup material employed;
  - e. the OC content of each coating and cleanup material employed, in pounds per gallon;
  - f. the total operating hours for the emissions unit, in hours per day;
    - g. for each day during which any photochemically reactive material (coating or cleanup material) is employed, the total OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., the summation of (d x e) for all coatings and all photochemically reactive cleanup materials employed, in pounds per day;
  - h. for each day during which a cleanup material is employed that is not a photochemically reactive material, the total OC emission rate from all such cleanup materials, i.e., the summation of (d x e) for all such cleanup materials employed, in pounds per day;
  - i. for each day during which any photochemically reactive material (coating or cleanup material) is

employed, the total OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (g / f), in pounds per hour; and

- j. for each day during which no photochemically reactive material (coating or cleanup material) is employed, the total OC emission rate for all coatings, i.e., the summation of (d x e) for all the coatings employed.

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

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

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#### IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #02-12200, issued on October 15, 1998: Section A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. In accordance with paragraph 3 of the General Terms and Conditions, the permittee shall submit deviation (excursion) reports which include the following information:
  - a. for each day during which any photochemically reactive material (coating or cleanup) is employed, an identification of each day during which the OC emissions exceeded 8 pounds per hour, and the actual OC emissions for each such day; and
  - b. for each day during which any photochemically reactive material (coating or cleanup) is employed, an identification of each day during which the OC emissions exceeded 40 pounds per day, and the actual OC emissions for each such day.
3. The permittee shall submit annual reports which specify the total OC emissions excluding nonphotochemically reactive cleanup materials (i.e., the summation of the daily values from A.III.2.g and j) and the total OC emissions from nonphotochemically reactive cleanup materials (i.e., the summation of the daily values from A.III.h) from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
4. The permittee shall notify the Ohio EPA Northeast District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Ohio EPA Northeast District Office within 30 days after the event occurs.

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#### V. Testing Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #02-12200, issued on October 15, 1998: Section A.V.2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
2. Compliance with the allowable emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:
 

OC emissions shall not exceed 7.3 tons per year, excluding nonphotochemically reactive cleanup materials.

Applicable Compliance Method:

Compliance with the annual emission limitation of 7.3 tons per year shall be demonstrated by summing the daily OC emissions in Sections A.III.2.g and j of these terms and conditions.
  - b. Emission Limitation:
 

OC emissions shall not exceed 40 pounds per day, excluding nonphotochemically reactive cleanup materials.

Applicable Compliance Method:

Compliance with the daily OC emission limitation shall be demonstrated based upon the record keeping requirements in Section A.III.2 of these terms and conditions.
  - c. Emission Limitation:
 

OC emissions shall not exceed 8 pounds per hour, excluding nonphotochemically reactive cleanup

materials.

Applicable Compliance Method:

Compliance with the hourly OC emission limitation shall be demonstrated based upon the recordkeeping requirements in Section A.III.2 of these terms and conditions.

d. Emission Limitation:

OC emissions from the use of nonphotochemically reactive cleanup materials shall not exceed 0.5 ton per year.

Applicable Compliance Method:

Compliance with the annual emission limitation of 0.5 ton per year shall be demonstrated by summing the daily OC emissions in Section A.III.3.h of these terms and conditions.

e. Emission Limitation:

Visible particulate emissions shall not exceed 5 percent opacity as a six-minute average.

Applicable Compliance Method:

Compliance shall be determined by visible emission observations performed in accordance with USEPA Reference Method 9 and the procedures specified in OAC rule 3745-17-03 (B)(1), if required by the Ohio EPA.

f. Emission Limitation:

Particulate emissions shall not exceed 0.551 pound per hour.

Applicable Compliance Method:

If required, compliance shall be demonstrated by emission testing in accordance with Method 5 of 40 CFR, Part 60, Appendix A.

3. Formulation data or U.S. EPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 0247040179 Emissions Unit ID: R001 Issuance type: Title V Final Permit

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

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>
Coating booth #1	None.	None.

2. **Additional Terms and Conditions**

1. None

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**II. Operational Restrictions**

1. None

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**III. Monitoring and/or Record Keeping Requirements**

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #02-12200, issued on October 15, 1998: Section B.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permit to install for this emissions unit (R001) was evaluated based on the actual materials employed 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 potentially emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each of the potential pollutants discharges from R001:

Pollutant: acetone  
 TLV (ug/m3): 1188000  
 Maximum Hourly Emission Rate (lbs/hr): 6.76  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1346  
 MAGLC (ug/m3): 4476

Pollutant: toluene  
 TLV (ug/m3): 188000  
 Maximum Hourly Emission Rate (lbs/hr): 4.98  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 978  
 MAGLC (ug/m3): 4476

Physical changes to or changes in the method of operation of the emissions unit after its installation 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 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 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.

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.

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**IV. Reporting Requirements**

1. None

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V. **Testing Requirements**

- 1. None

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 0247040179 Emissions Unit ID: R002 Issuance type: Title V Final Permit

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
Coating booth #2	OAC rule 3745-31-05(A)(3) PTI No. 02-12200	OC emissions shall not exceed 7.3 tons per year, excluding nonphotochemically reactive cleanup materials.
		OC emissions from the use of nonphotochemically reactive cleanup materials shall not exceed 0.5 ton per year.
		Visible particulate emissions shall not exceed 5 percent opacity as a six-minute average.
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11(B)(1).
	OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 40 pounds per day, excluding nonphotochemically reactive cleanup materials.
	OAC rule 3745-17-07(A)(1)	OC emissions shall not exceed 8 pounds per hour, excluding nonphotochemically reactive cleanup materials.
	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
		Particulate emissions shall not exceed 0.551 pound per hour.

2. **Additional Terms and Conditions**

- (a) None

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II. **Operational Restrictions**

1. This emissions unit shall not employ cleanup materials that are photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

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### III. Monitoring and/or Record Keeping Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #02-12200, issued on October 15, 1998: Section A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
2. The permittee shall collect and record the following information on a daily basis for this emissions unit:
  - a. the company identification for each coating employed;
  - b. the company identification of each cleanup material employed and its physical state;
  - c. for each coating and cleanup material, whether or not each material is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5);
  - d. the number of gallons of each coating and each cleanup material employed;
  - e. the OC content of each coating and cleanup material employed, in pounds per gallon;
  - f. the total operating hours for the emissions unit, in hours per day;
    - g. for each day during which any photochemically reactive material (coating or cleanup material) is employed, the total OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., the summation of (d x e) for all coatings and all photochemically reactive cleanup materials employed, in pounds per day;
  - h. for each day during which a cleanup material is employed that is not a photochemically reactive material, the total OC emission rate from all such cleanup materials, i.e., the summation of (d x e) for all such cleanup materials employed, in pounds per day;
  - i. for each day during which any photochemically reactive material (coating or cleanup material) is employed, the total OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (g / f), in pounds per hour; and
  - j. for each day during which no photochemically reactive material (coating or cleanup material) is employed, the total OC emission rate for all coatings, i.e., the summation of (d x e) for all the coatings employed.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]
3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

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### IV. Reporting Requirements

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #02-12200, issued on October 15, 1998: Section A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.
2. In accordance with paragraph 3 of the General Terms and Conditions, the permittee shall submit deviation (excursion) reports which include the following information:
  - a. for each day during which any photochemically reactive material (coating or cleanup) is employed, an identification of each day during which the OC emissions exceeded 8 pounds per hour, and the actual OC emissions for each such day; and
  - b. for each day during which any photochemically reactive material (coating or cleanup) is employed, an identification of each day during which the OC emissions exceeded 40 pounds per day, and the actual OC emissions for each such day.
3. The permittee shall submit annual reports which specify the total OC emissions excluding nonphotochemically reactive cleanup materials (i.e., the summation of the daily values from A.III.2.g and j) and the total OC emissions from nonphotochemically reactive cleanup materials (i.e., the summation of the daily values from A.III.h) from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
4. The permittee shall notify the Ohio EPA Northeast District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall

include a copy of such record and shall be sent to the Ohio EPA Northeast District Office within 30 days after the event occurs.

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V. **Testing Requirements**

1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #02-12200, issued on October 15, 1998: Section A.V.2. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.
2. Compliance with the allowable emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. **Emission Limitation:**

OC emissions shall not exceed 7.3 tons per year, excluding nonphotochemically reactive cleanup materials.

**Applicable Compliance Method:**

Compliance with the annual emission limitation of 7.3 tons per year shall be demonstrated by summing the daily OC emissions in Section A.III.2.g and j of these terms and conditions.
  - b. **Emission Limitation:**

OC emissions shall not exceed 40 pounds per day, excluding nonphotochemically reactive cleanup materials.

**Applicable Compliance Method:**

Compliance with the daily OC emission limitation shall be demonstrated based upon the record keeping requirements in Section A.III.2 of these terms and conditions.
  - c. **Emission Limitation:**

OC emissions shall not exceed 8 pounds per hour, excluding nonphotochemically reactive cleanup materials.

**Applicable Compliance Method:**

Compliance with the hourly OC emission limitation shall be demonstrated based upon the recordkeeping requirements in Section A.III.2 of these terms and conditions.
  - d. **Emission Limitation:**

OC emissions from the use of nonphotochemically reactive cleanup materials shall not exceed 0.5 ton per year.

**Applicable Compliance Method:**

Compliance with the annual emission limitation of 0.5 ton per year shall be demonstrated by summing the daily OC emissions in Section A.III.3.h of these terms and conditions.
  - e. **Emission Limitation:**

Visible particulate emissions shall not exceed 5 percent opacity as a six-minute average.

**Applicable Compliance Method:**

Compliance shall be determined by visible emission observations performed in accordance with USEPA Reference Method 9 and the procedures specified in OAC rule 3745-17-03 (B)(1), if required by the Ohio EPA.
  - f. **Emission Limitation:**

Particulate emissions shall not exceed 0.551 pound per hour.

**Applicable Compliance Method:**

If required, compliance shall be demonstrated by emission testing in accordance with Method 5 of 40 CFR, Part 60, Appendix A.
3. Formulation data or U.S. EPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

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VI. **Miscellaneous Requirements**

- 1. None

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**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

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>
Coating booth #2	None.	None.
<b>2. Additional Terms and Conditions</b>		
1. None		

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #02-12200, issued on October 15, 1998: Section B.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.
- 2. The permit to install for this emissions unit (R002) was evaluated based on the actual materials employed 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 potentially emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each of the potential pollutants discharges from R002:

Pollutant: acetone  
 TLV (ug/m3): 1188000  
 Maximum Hourly Emission Rate (lbs/hr): 6.76  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1346  
 MAGLC (ug/m3): 4476

Pollutant: toluene  
 TLV (ug/m3): 188000  
 Maximum Hourly Emission Rate (lbs/hr): 4.98  
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 978  
 MAGLC (ug/m3): 4476

Physical changes to or changes in the method of operation of the emissions unit after its installation 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 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 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.

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.

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None