



Environmental
Protection Agency

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

3/21/2011

ROBERT MANGUS
Accel Group Inc
325 QUADRAL DRIVE
Wadsworth, OH 44281

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

Facility ID: 1652100086
Permit Number: P0107572
Permit Type: Renewal
County: Medina

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 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, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: ARAQMD



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Accel Group Inc**

Facility ID:	1652100086
Permit Number:	P0107572
Permit Type:	Renewal
Issued:	3/21/2011
Effective:	3/21/2011
Expiration:	3/21/2016



Division of Air Pollution Control
Permit-to-Install and Operate
for
Accel Group Inc

Table of Contents

Authorization 1
A. Standard Terms and Conditions 3
1. What does this permit-to-install and operate ("PTIO") allow me to do?..... 4
2. Who is responsible for complying with this permit? 4
3. What records must I keep under this permit? 4
4. What are my permit fees and when do I pay them?..... 4
5. When does my PTIO expire, and when do I need to submit my renewal application? 4
6. What happens to this permit if my project is delayed or I do not install or modify my source? 5
7. What reports must I submit under this permit? 5
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? 5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ... 5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? 6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? 6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? 6
13. Can I transfer this permit to a new owner or operator?..... 7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? 7
15. What happens if a portion of this permit is determined to be invalid? 7
B. Facility-Wide Terms and Conditions..... 8
C. Emissions Unit Terms and Conditions 11
1. R001, Panel Laminating Line 12
2. R004, Finished Parts Wiping..... 18
3. Emissions Unit Group - Adhesive Booths: R002, R003, 25

Authorization

Facility ID: 1652100086
Application Number(s): A0041188
Permit Number: P0107572
Permit Description: Renewal of the Federally Enforceable Permit to Install and Operate for the panel laminating line R001, the two adhesive spray booths R002 and R003, and the finished parts wiping R004.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 3/21/2011
Effective Date: 3/21/2011
Expiration Date: 3/21/2016
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Accel Group Inc
325 QUADRAL DRIVE
WADSWORTH, OH 44281

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

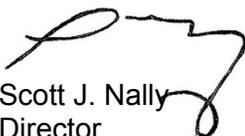
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

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: P0107572
Permit Description: Renewal of the Federally Enforceable Permit to Install and Operate for the panel laminating line R001, the two adhesive spray booths R002 and R003, and the finished parts wiping R004.

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

Emissions Unit ID: R001
Company Equipment ID: Panel Laminating Line
Superseded Permit Number: 16-01972
General Permit Category and Type: Not Applicable

Emissions Unit ID: R004
Company Equipment ID: Finished Parts Wiping
Superseded Permit Number: 16-01972
General Permit Category and Type: Not Applicable

Group Name: Adhesive Booths

Emissions Unit ID:	R002
Company Equipment ID:	Adhesive Booth #1
Superseded Permit Number:	16-01972
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R003
Company Equipment ID:	Adhesive Booth #2
Superseded Permit Number:	16-01972
General Permit Category and Type:	Not Applicable

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 submitting¹ 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.

¹ 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).

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 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

Final Permit-to-Install and Operate

Accel Group Inc

Permit Number: P0107572

Facility ID: 1652100086

Effective Date: 3/21/2011

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, and 5.
2. The emissions of any individual hazardous air pollutant (HAP), combined HAPs, and volatile organic compounds (VOC) from the entire facility (emissions units R001, R002, R003, and R004, combined) shall not exceed 9.76 tons per year, 23.73 tons per year, and 90.88 tons per year, respectively, based upon the rolling, 12-month summations of the monthly emission rates.
3. In order to demonstrate compliance with the emission limitations in 2 above, the permittee shall collect and record the following information each month for emissions units R001, R002, R003, and R004, combined:
 - a) the company identification of each adhesive, thinner and cleanup material employed;
 - b) the individual HAP content for each HAP of each adhesive, thinner and cleanup material, in pounds per gallon, as applied;
 - c) the number of gallons of each adhesive, thinner and cleanup material employed;
 - d) the emission rate for each individual HAP from each adhesive, thinner and cleanup material employed (i.e., 3.b) x 3.c)) for each individual HAP, in pounds;
 - e) the total emission rate for each individual HAP from all the adhesives, thinners and cleanup materials employed (for each individual HAP, the summation of 3.d) for all adhesives, thinners and cleanup materials), in pounds;
 - f) the combined HAP emission rate from all the adhesives, thinners and cleanup materials employed (summation of 3.e) for all HAPs for all adhesive, thinners and cleanup materials, divided by 2000 pounds per ton), in tons;
 - g) the total VOC emissions from all the adhesives, thinners and cleanup materials employed, in tons (summation of the VOC emissions, from Section C – Emissions Unit Terms and Conditions 1.d)(2)d. for emissions unit R001 plus 2.d)(2)d. for emissions unit R004 plus 3.d)(2)d for emissions units R002 and R003, divided by 2000 pounds per ton);
 - h) the rolling, 12-month emissions of each individual HAP and combined HAPs, in tons; and
 - i) the rolling, 12-month VOC emissions, in tons.

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 VOC emission limitation of 90.88 tons, for emissions units R001, R002, R003, and R004, combined;
 - (2) all exceedance of the rolling, 12-month individual HAP emission limitation of 9.76 tons, for emissions units R001, R002, R003, and R004, combined; and
 - (3) all exceedances of the rolling, 12-month combined HAP emission limitation of 23.73 tons, for emissions units R001, R002, R003, and R004, 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 limitations in 2 above shall be determined in accordance with the following method(s):

- a) Emissions Limitations:

The emissions of any individual HAP, combined HAPs, and VOC from the entire facility (emissions units R001, R002, R003, and R004, combined) shall not exceed 9.76 tons per year, 23.73 tons per year, and 90.88 tons per year, respectively, based upon the rolling, 12-month summations of the monthly emission rates.

Applicable Compliance Method:

Compliance with the annual allowable VOC, individual HAP, and combined HAPs emission limitations above shall be demonstrated based on the record keeping requirements established in 3 above.

C. Emissions Unit Terms and Conditions

1. R001, Panel Laminating Line

Operations, Property and/or Equipment Description:

Panel laminating line with reciprocating spray guns and drying oven to apply contact adhesive.

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. d)(3), d)(4), and d)(5).

(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)b., c)(2), d)(2), e)(1), f)(1)c. and f)(1)d.

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)	The emissions of volatile organic compounds (VOC) from this emissions unit shall not exceed 42.3 pounds per hour and 63.45 tons per year. The emissions of acetone from this emissions unit shall not exceed 42.3 pounds per hour and 61.83 tons per year. The VOC content of each adhesive, thinner, and cleanup material employed in this emissions unit shall not exceed 2.82 pounds per gallon, as applied.
b.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Title V and to avoid Prevention of Significant Deterioration (PSD))	See 2, 3, 4, and 5 of Section B – Facility-Wide Terms and Conditions. See c)(2) below.
c.	OAC rule 3745-21-07(G)(2)	Exempt from the requirements of this rule pursuant to c)(1) below.

- (2) Additional Terms and Conditions
 - a. None.
- c) Operational Restrictions
 - (1) The permittee shall not employ any photochemically reactive materials, as defined in OAC 3745-21-01(C)(5), in this emissions unit.
 - (2) The maximum annual adhesive usage for emissions unit R001 shall not exceed 45,000 gallons, based upon a rolling, 12-month summation of the adhesive usage.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall maintain Material Safety Data Sheets (MSDS) for each adhesive, thinner, and cleanup material employed at this facility.
 - (2) The permittee shall maintain records, on a monthly basis, of the following information for this emissions unit:
 - a. the name and identification number of each adhesive, thinner, and cleanup material employed, and documentation of whether or not each material employed is a photochemically reactive material;
 - b. the number of gallons of each adhesive, thinner, and cleanup material employed;
 - c. the VOC content, in pounds of VOC per gallon, and the acetone content, in pounds of acetone per gallon, of each adhesive, thinner, and cleanup material employed;
 - d. the calculated VOC emission rate from all the adhesives, thinners, and cleanup materials employed, in pounds [summation of (b x c) for all adhesives + summation of (b x c) for all thinners + summation of (b x c) for all cleanup materials];
 - e. the calculated acetone emission rate from all the adhesives, thinners, and cleanup materials employed, in pounds [summation of (b x c) for all adhesives + summation of (b x c) for all thinners + summation of (b x c) for all cleanup materials];
 - f. the number of hours the emissions unit was in operation;
 - g. the average hourly VOC and acetone emission rates, in pounds per hour;
 - h. the total adhesive usage rate, in gallons [summation of b for all adhesives]; and
 - i. the rolling, 12-month adhesive usage rate, in gallons.
 - (3) The permit to install 16-01972 for this emissions unit (R001) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air

Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: isopropyl alcohol

TLV (mg/m3): 491.3

Maximum Hourly Emission Rate (lbs/hr): 50

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 3,934

MAGLC (ug/m3): 11,698

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

- (5) 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.

e) Reporting Requirements

(1) 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:
 - i. all exceedances of the rolling, 12-month adhesive usage limitation of 45,000 gallons; and
 - ii. all exceedance of the VOC content limitation of 2.82 pounds of VOC per gallon, as applied, for each adhesive, thinner, and cleanup material employed.
- 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). The permittee shall notify the Director (the Akron Regional Air Quality Management District) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the Akron Regional Air Quality Management District) within 30 days following the end of the calendar month.

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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 limitations in b)(1) above shall be determined in accordance with the following methods:

a. Emission Limitations:

The emissions of VOC from this emissions unit shall not exceed 42.3 pounds per hour and 63.45 tons per year.

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation above shall be demonstrated based on the record keeping requirements established in d)(2) above.

Compliance with the annual allowable VOC emission limitation above shall be demonstrated based on the record keeping requirements established in d)(2), and shall be the summation of the 12 monthly VOC emission rates for the calendar year, divided by 2000 pounds per ton.

b. Emission Limitations:

The emissions of acetone from this emissions unit shall not exceed 42.3 pounds per hour and 61.83 tons per year.

Applicable Compliance Method:

Compliance with the hourly allowable acetone emission limitation above shall be demonstrated based on the record keeping requirements established in d)(2) above.

Compliance with the annual allowable acetone emission limitation above shall be demonstrated based on the record keeping requirements established in d)(2) above, and shall be the summation of the 12 monthly acetone emission rates for the calendar year, divided by 2000 pounds per ton.

c. Emission Limitation:

The VOC content of each adhesive, thinner, and cleanup material employed in this emissions unit shall not exceed 2.82 pounds per gallon, as applied.

Applicable Compliance Method:

Compliance with the VOC content limitation above shall be based upon the record keeping requirements specified in d)(2) above. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the adhesives, thinners, and cleanup materials.

d. Operational Restriction:

45,000 gallons of adhesive usage per rolling, 12-month period

Final Permit-to-Install and Operate

Accel Group Inc

Permit Number: P0107572

Facility ID: 1652100086

Effective Date: 3/21/2011

Applicable Compliance Method

Compliance shall be demonstrated through the record keeping requirements established in d)(2) above.

g) Miscellaneous Requirements

(1) None.

2. R004, Finished Parts Wiping

Operations, Property and/or Equipment Description:

Hand wiping of finished product

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. d)(3), d)(4), and d)(5).

(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)b., c)(2), d)(2), e)(2), f)(1)e., and f)(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)	<p>The emissions of volatile organic compound (VOC) from this emissions unit shall not exceed 10.04 pounds per hour and 15.05 tons per year.</p> <p>The emissions of toluene from this emissions unit shall not exceed 2.07 pounds per hour and 3.11 tons per year.</p> <p>The emissions of methyl ethyl ketone (MEK) from this emissions unit shall not exceed 4.73 pounds per hour and 7.09 tons per year.</p> <p>The emissions of methyl isobutyl ketone (MIBK) from this emissions unit shall not exceed 1.01 pounds per hour and 1.51 tons per year.</p> <p>The VOC content of each adhesive,</p>

Final Permit-to-Install and Operate

Accel Group Inc

Permit Number: P0107572

Facility ID: 1652100086

Effective Date: 3/21/2011

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		thinner, and cleanup material employed in this emissions unit shall not exceed 6.69 pounds per gallon, as applied.
b.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Title V and to avoid Prevention of Significant Deterioration (PSD))	See 2, 3, 4, and 5 of Section B – Facility-Wide Terms and Conditions. See c)(2) below.
c.	OAC rule 3745-21-07(G)(2)	Exempt from the requirements of this rule pursuant to c)(1) below.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The permittee shall not employ any photochemically reactive materials, as defined in OAC 3745-21-01(C)(5), in this emissions unit.

(2) The maximum annual adhesive usage for emissions unit R004 shall not exceed 4,500 gallons, based upon a rolling, 12-month summation of the adhesive usage.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain Material Safety Data Sheets (MSDS) for each adhesive, thinner, and cleanup material employed at this facility.

(2) The permittee shall maintain records, on a monthly basis, of the following information for this emissions unit:

a. the name and identification number of each adhesive, thinner, and cleanup material employed, and documentation of whether or not each material employed is a photochemically reactive material;

b. the number of gallons of each adhesive, thinner, and cleanup material employed;

c. the VOC content, in pounds of VOC per gallon, the MEK content, in pounds of MEK per gallon, the MIBK content, in pounds of MIBK per gallon and the toluene content, in pounds of toluene per gallon of each adhesive, thinner, and cleanup material employed;

d. the calculated VOC emission rate from all the adhesives, thinners, and cleanup materials employed, in pounds [summation of (b x c) for all adhesives + summation of (b x c) for all thinners + summation of (b x c) for all cleanup materials];

- e. The calculated MEK emission rate from all the adhesives, thinners, and cleanup materials employed, in pounds [summation of (b x c) for all adhesives + summation of (b x c) for all thinners + summation of (b x c) for all cleanup materials];
 - f. The calculated MIBK emission rate from all the adhesives, thinners, and cleanup materials employed, in pounds [summation of (b x c) for all adhesives + summation of (b x c) for all thinners + summation of (b x c) for all cleanup materials];
 - g. The calculated toluene emission rate from all the adhesives, thinners, and cleanup materials employed, in pounds [summation of (b x c) for all adhesives + summation of (b x c) for all thinners + summation of (b x c) for all cleanup materials];
 - h. the number of hours the emissions unit was in operation;
 - i. the average hourly VOC, MEK, MIBK, and toluene emission rates, in pounds per hour;
 - j. the total adhesive usage rate, in gallons [summation of b for all adhesives]; and
 - k. the rolling, 12-month adhesive usage rate, in gallons
- (3) The permit to install 16-01972 for emissions unit (R004) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):
- Pollutant: light aliphatic solvent naphtha
- TLV (mg/m³): 52.4
- Maximum Hourly Emission Rate (lbs/hr): 9
- Predicted 1 Hour Maximum Ground-Level Concentration (ug/m³): 1,238
- MAGLC (ug/m³): 1,247.6
- (4) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change.

Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

- (5) 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.

e) Reporting Requirements

- (1) 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:
 - i. all exceedances of the rolling, 12-month adhesive usage limitation of 4,500 gallons; and

- ii. all exceedance of the VOC content limitation of 6.69 pounds of VOC per gallon, as applied, for each adhesive, thinner, and cleanup material employed.
- 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). The permittee shall notify the Director (the Akron Regional Air Quality Management District) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the Akron Regional Air Quality Management District) within 30 days following the end of the calendar month.

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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 limitations in b)(1) above shall be determined in accordance with the following methods:

- a. Emission Limitation:

The emissions of VOC from this emissions unit shall not exceed 10.04 pounds per hour and 15.05 tons per year.

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation above shall be demonstrated based on the record keeping requirements established in d)(2) above.

Compliance with the annual allowable VOC emission limitation above shall be demonstrated based on the record keeping requirements established d)(2) above, and shall be the summation of the 12 monthly VOC emission rates for the calendar year, divided by 2000 pounds per ton.

b. Emission Limitation:

The emissions of toluene from this emissions unit shall not exceed 2.07 pounds per hour and 3.11 tons per year.

Applicable Compliance Method:

Compliance with the hourly allowable toluene emission limitation above shall be demonstrated based on the record keeping requirements established d)(2) above.

Compliance with the annual allowable toluene emission limitation above shall be demonstrated based on the record keeping requirements established in d)(2) above, and shall be the summation of the 12 monthly toluene emission rates for the calendar year, divided by 2000 pounds per ton.

c. Emission Limitation:

The emissions of MEK from this emissions unit shall not exceed 4.73 pounds per hour and 7.09 tons per year.

Applicable Compliance Method:

Compliance with the hourly allowable MEK emission limitation above shall be demonstrated based on the record keeping requirements established in d)(2) above.

Compliance with the annual allowable MEK emission limitation above shall be demonstrated based on the record keeping requirements established in d)(2) above, and shall be the summation of the 12 monthly MEK emission rates for the calendar year, divided by 2000 pounds per ton.

d. Emission Limitation:

The emissions of MIBK from this emissions unit shall not exceed 1.01 pounds per hour and 1.51 tons per year.

Applicable Compliance Method:

Compliance with the hourly allowable MIBK emission limitation above shall be demonstrated based on the record keeping requirements established in d)(2) above.

Compliance with the annual allowable MIBK emission limitation above shall be demonstrated based on the record keeping requirements established in d)(2) above, and shall be the summation of the 12 monthly MIBK emission rates for the calendar year, divided by 2000 pounds per ton.

e. Emission Limitation:

The VOC content of each adhesive, thinner, and cleanup material employed in this emissions unit shall not exceed 6.69 pounds per gallon, as applied.

Applicable Compliance Method:

Compliance with the VOC content limitation above shall be based upon the record keeping requirements specified in d)(2) above. Formulation data or U.S. EPA Method 24

shall be used to determine the VOC content of the adhesives, thinners, and cleanup materials.

f. Operational Restriction:

The maximum annual adhesive usage for emissions unit R004 shall not exceed 4,500 gallons, based upon a rolling, 12-month summation of the adhesive usage.

Applicable Compliance Method:

Compliance shall be based on the recordkeeping requirements as specified in d)(2) above.

g) Miscellaneous Requirements

(1) None.

3. Emissions Unit Group - Adhesive Booths: R002, R003,

EU ID	Operations, Property and/or Equipment Description
R002	Adhesive booth # 1 - hand spray contact adhesive
R003	Adhesive booth # 2 - hand spray contact adhesive

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. d)(3), d)(4), and d)(5).

(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)b., c)(2), c)(3), d)(2), e)(1), f)(1)c., and f)(1)d.

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)	<p>For emissions units R002 and R003: The emissions of volatile organic compounds (VOC) from each emissions unit shall not exceed 3.96 pounds per hour and 6.19 tons per year.</p> <p>For emissions units R002 and R003: The emissions of acetone from each emissions unit shall not exceed 3.96 pounds per hour and 4.03 tons per year.</p> <p>For emissions units R002 and R003: The emissions of hexane from each emissions unit shall not exceed 3.12 pounds per hour and 4.88 tons per year.</p> <p>For emissions units R002 and R003: The emissions of toluene from each emissions unit shall not exceed 0.72 pound per hour</p>

Final Permit-to-Install and Operate

Accel Group Inc

Permit Number: P0107572

Facility ID: 1652100086

Effective Date: 3/21/2011

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		and 1.13 tons per year. For emissions units R002 and R003: The VOC content of each adhesive, thinner, and cleanup material employed shall not exceed 3.3 pounds per gallon, as applied.
b.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Title V and to avoid Prevention of Significant Deterioration (PSD))	See 2, 3, 4, and 5 of Section B – Facility-Wide Terms and Conditions. See c)(2) and c)(3) below.
c.	OAC rule 3745-21-07(G)(2)	Exempt from the requirements of this rule pursuant to c)(1) below.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The permittee shall not employ any photochemically reactive materials, as defined in OAC 3745-21-01(C)(5), in the emissions units listed above.

(2) The maximum annual adhesive usage for emissions unit R002 shall not exceed 3,750 gallons, based upon a rolling, 12-month summation of the adhesive usage.

(3) The maximum annual adhesive usage for emissions unit R003 shall not exceed 3,750 gallons, based upon a rolling, 12-month summation of the adhesive usage.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain Material Safety Data Sheets (MSDS) for each adhesive, thinner, and cleanup material employed at this facility.

(2) The permittee shall maintain records, on a monthly basis, of the following information for each emissions unit, separately:

a. the name and identification number of each adhesive, thinner, and cleanup material employed, and documentation of whether or not each material employed is a photochemically reactive material;

b. the number of gallons of each adhesive, thinner, and cleanup material employed;

c. the VOC content, in pounds of VOC per gallon, the acetone content, in pounds of acetone per gallon, the hexane content, in pounds of hexane per gallon and the toluene content, in pounds of toluene per gallon of each adhesive, thinner, and cleanup material employed;

Final Permit-to-Install and Operate

Accel Group Inc

Permit Number: P0107572

Facility ID: 1652100086

Effective Date: 3/21/2011

- d. the calculated VOC emission rate from all the adhesives, thinners, and cleanup materials employed, in pounds [summation of (b x c) for all adhesives + summation of (b x c) for all thinners + summation of (b x c) for all cleanup materials];
- e. the calculated acetone emission rate from all the adhesives, thinners, and cleanup materials employed, in pounds [summation of (b x c) for all adhesives + summation of (b x c) for all thinners + summation of (b x c) for all cleanup materials];
- f. the calculated hexane emission rate from all the adhesives, thinners, and cleanup materials employed, in pounds [summation of (b x c) for all adhesives + summation of (b x c) for all thinners + summation of (b x c) for all cleanup materials];
- g. the calculated toluene emission rate from all the adhesives, thinners, and cleanup materials employed, in pounds [summation of (b x c) for all adhesives + summation of (b x c) for all thinners + summation of (b x c) for all cleanup materials];
- h. the number of hours the emissions unit was in operation;
- i. the average hourly VOC, acetone, hexane, and toluene emission rates, in pounds per hour;
- j. the total adhesive usage rate, in gallons [summation of b for all adhesives]; and
- k. the rolling, 12-month adhesive usage rate, in gallons.

(3) The permit to install 16-01970 for emissions units (R002 and R003) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: hexane

TLV (mg/m³): 176.2

Maximum Hourly Emission Rate (lbs/hr): 25

Predicted 1 Hour Maximum Ground-Level Concentration (ug/m³): 3,456

MAGLC (ug/m³): 4,195

(4) Physical changes to or changes in the method of operation of either emissions unit after its installation or modification could affect the parameters used to determine whether or

not the "AirToxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- (5) 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.
- e) Reporting Requirements
- (1) 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:

Final Permit-to-Install and Operate

Accel Group Inc

Permit Number: P0107572

Facility ID: 1652100086

Effective Date: 3/21/2011

- i. all exceedances of the rolling, 12-month adhesive usage limitation of 3,750 gallons for emissions unit R002 and/or emissions unit R003; and
 - ii. all exceedance of the VOC content limitation of 3.3 pounds of VOC per gallon, as applied, for each adhesive, thinner, and cleanup material employed for emissions unit R002 and/or emissions unit R003.
- 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). The permittee shall notify the Director (the Akron Regional Air Quality Management District) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the Akron Regional Air Quality Management District) within 30 days following the end of the calendar month.

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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 limitations in this permit shall be determined in accordance with the following methods:

- a. **Emission Limitations:**

For emissions units R002 and R003: The emissions of VOC from each emissions unit shall not exceed 3.96 pounds per hour and 6.19 tons per year.

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation above shall be demonstrated based on the record keeping requirements established in d)(2) above.

Compliance with the annual allowable VOC emission limitation above shall be demonstrated based on the record keeping requirements established in d)(2)

above, and shall be the summation of the 12 monthly VOC emission rates for the calendar year, divided by 2000 pounds per ton.

b. Emission Limitations:

For emissions units R002 and R003: The emissions of acetone from each emissions unit shall not exceed 3.96 pounds per hour and 4.03 tons per year.

Applicable Compliance Method:

Compliance with the hourly allowable acetone emission limitation above shall be demonstrated based on the record keeping requirements established in d)(2) above.

Compliance with the annual allowable acetone emission limitation above shall be demonstrated based on the record keeping requirements established in d)(2) above, and shall be the summation of the 12 monthly acetone emission rates for the calendar year, divided by 2000 pounds per ton.

c. Emission Limitation:

For emissions units R002 and R003: The VOC content of each adhesive, thinner, and cleanup material employed shall not exceed 3.3 pounds per gallon, as applied.

Applicable Compliance Method:

Compliance with the VOC content limitation above shall be based upon the record keeping requirements specified in d)(2) above. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the adhesives, thinners, and cleanup materials.

d. Operational Restrictions:

The maximum annual adhesive usage for emissions unit R002 shall not exceed 3,750 gallons, based upon a rolling, 12-month summation of the adhesive usage.

The maximum annual adhesive usage for emissions unit R003 shall not exceed 3,750 gallons, based upon a rolling, 12-month summation of the adhesive usage.

Applicable Compliance Method

Compliance shall be demonstrated through the record keeping requirements established in d)(2) above.

e. Emission Limitations:

For emissions units R002 and R003: The emissions of hexane from each emissions unit shall not exceed 3.12 pounds per hour and 4.88 tons per year.

Applicable Compliance Method:

Compliance with the hourly allowable hexane emission limitation above shall be demonstrated based on the record keeping requirements established in d)(2) above.

Compliance with the annual allowable hexane emission limitation above shall be demonstrated based on the record keeping requirements established in d)(2) above, and shall be the summation of the 12 monthly hexane emission rates for the calendar year, divided by 2000 pounds per ton.

f. Emission Limitations:

For emissions units R002 and R003: The emissions of toluene from each emissions unit shall not exceed 0.72 pound per hour and 1.13 tons per year.

Applicable Compliance Method:

Compliance with the hourly allowable toluene emission limitation above shall be demonstrated based on the record keeping requirements established in d)(2) above.

Compliance with the annual allowable toluene emission limitation above shall be demonstrated based on the record keeping requirements established in d)(2) above, and shall be the summation of the 12 monthly toluene emission rates for the calendar year, divided by 2000 pounds per ton.

g) Miscellaneous Requirements

(1) None.