Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Certified Mail

4/19/2011

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
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)

MORRIS LEAR
GUARDIAN AUTOMOTIVE PRODUCTS
12688 STATE HWY 67
UPPER SANDUSKY, OH 43351

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0388010022
Permit Number: P0107555
Permit Type: Administrative Modification
County: Wyandot

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 Ohio EPA DAPC, Northwest District Office at (419)352-8461 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

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

Cc: Ohio EPA-NWDO

50 West Town Street, Suite 700
P.O. Box 1049
Columbus, OH 43216-1049

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Ohio Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
GUARDIAN AUTOMOTIVE PRODUCTS

Facility ID:	0388010022
Permit Number:	P0107555
Permit Type:	Administrative Modification
Issued:	4/19/2011
Effective:	4/19/2011
Expiration:	8/13/2020

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
GUARDIAN AUTOMOTIVE PRODUCTS

Table of Contents

Authorization

Facility ID: 0388010022
Application Number(s): M0001066
Permit Number: P0107555
Permit Description: Administrative Modification - numerous miscellaneous items across multiple emissions units
Permit Type: Administrative Modification
Permit Fee: $0.00
Issue Date: 4/19/2011
Effective Date: 4/19/2011
Expiration Date: 8/13/2020
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

GUARDIAN AUTOMOTIVE PRODUCTS
12688 ST. ROUTE 67
Upper Sandusky, OH 43351

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

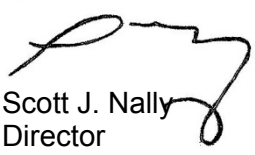
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

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

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: P0107555
Permit Description: Administrative Modification - numerous miscellaneous items across multiple emissions units

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

Emissions Unit ID:	**R003**
Company Equipment ID:	Silk Screening Machine with Cure Oven
Superseded Permit Number:	P0087982
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R017**
Company Equipment ID:	CSSW1
Superseded Permit Number:	P0087982
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R018**
Company Equipment ID:	Temper/silkscreen
Superseded Permit Number:	P0087982
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R019**
Company Equipment ID:	CPL5
Superseded Permit Number:	P0087982
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R020**
Company Equipment ID:	PL-4 silkscreen
Superseded Permit Number:	P0087982
General Permit Category and Type:	Not Applicable

Group Name: Group A - Pre-prime Stations

Emissions Unit ID:	**R004**
Company Equipment ID:	ENCAPPRPV1
Superseded Permit Number:	P0087982
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R006**
Company Equipment ID:	ENCAPPRPRV3
Superseded Permit Number:	P0087982
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R007**
Company Equipment ID:	ENCAPPRPRV4
Superseded Permit Number:	P0087982
General Permit Category and Type:	Not Applicable

Group Name: Group B - Spray Mold Release

Emissions Unit ID:	**R009**
Company Equipment ID:	ENCAPB1MR
Superseded Permit Number:	P0087982
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R010**
Company Equipment ID:	ENCAPB2MR
Superseded Permit Number:	P0087982
General Permit Category and Type:	Not Applicable

Group Name: Group C - Post-prime Stations

Emissions Unit ID:	**R011**
Company Equipment ID:	ENCAPPOPV1
Superseded Permit Number:	P0087982
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R012**
Company Equipment ID:	ENCAPPOPV2
Superseded Permit Number:	P0087982
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R013**
Company Equipment ID:	ENCAPPOPMV3
Superseded Permit Number:	P0087982
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R014**
Company Equipment ID:	ENCPAPOPMV4
Superseded Permit Number:	P0087982
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R015**
Company Equipment ID:	ENCAPPOPMV5
Superseded Permit Number:	P0087982
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 Ohio EPA DAPC, Northwest District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

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

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

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

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting[1] 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

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) None.

C. Emissions Unit Terms and Conditions

1. R003, Silk Screening Machine with Cure Oven

Operations, Property and/or Equipment Description:

PL-2 silkscreen coating line with water and earth slurry

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. None.

(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. None.

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)	39.9 lbs organic compounds (OC) /day; 7.28 tons OC /yr 0.18 lb particulate emissions (PE)/hr; 0.79 ton PE/yr Visible PE shall not exceed 0% opacity as a six-minute average See c)(1).
b.	OAC rule 3745-17-11(B)	See b)(2)a.
c.	OAC rule 3745-17-07(A)	See b)(2)a.

(2) Additional Terms and Conditions

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

c) Operational Restrictions

(1) The permittee shall not employ any clean-up material containing organic compounds in this emissions unit. (Note: solvent clean-up done in emissions unit R017)

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for each day for this emissions unit:

a. the company identification for each coating/ink employed;

b. the number of gallons of each coating/ink employed;

c. the OC content of each coating/ink, in lbs/gallon, as applied;

d. the OC emission rate for each coating/ink applied, in lbs/day [d)(1)b. x d)(1)c.];

e. the total OC emission rate for all coatings/inks [the summation of d)(1)d.], in lbs/day; and

(2) The permittee shall maintain records /documentation of whether or not each cleanup material employed contains organic compounds.

(3) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. the total duration of any visible emission incident; and;

c. any corrective action taken to eliminate the visible emissions.

e) Reporting Requirements

(1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

(2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(2) above:

a. All days during which any visible emissions were observed from the stack serving this emissions unit; and

b. Any corrective action taken to eliminate the visible particulate emissions.

f) Testing Requirements

(1) Compliance with the emission limitation(s) in section b)(1) of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation:
39.9 lbs OC /day

Applicable Compliance Method:
Compliance with daily organic compound emission limit shall be based upon the record keeping requirements contained in section d)(1) of this permit.

b. Emission Limitation:
7.28 tons OC /yr

Applicable Compliance Method:
The annual OC emission limitation of 7.28 tons was developed by multiplying the allowable daily OC emission limitation of 39.9 pounds by the maximum operating schedule of 365 days/year and dividing by 2000 pounds/ton. Therefore, provided compliance with the daily limitation is maintained, compliance with the annual limitation shall also be demonstrated.

c. Emissions Limitation:
0.18 lb PE/hr and 0.79 ton PE/yr

Applicable compliance Method:
The hourly emission limitation is based on the emission unit's potential to emit.* Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit is based on a maximum gallon usage of 9.17 gal/hr of slurry and a maximum solids content of 0.02 lb/gal.

If required, compliance with this limitation shall be based on stack testing using the methods and procedures specified in 40 CFR Part 60, Appendix A- Methods 1- 5.

The ton per year limitation was developed by multiplying the lb/hr allowable mass emission rate by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall also be demonstrated.

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

Applicable Compliance Method:
If required, compliance shall be determined in accordance with Method 9 of 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

(1) None.

2. R017, CSSW1

Operations, Property and/or Equipment Description:

Silkscreen cleaning station

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. None.

(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. None.

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)	39.9 lbs organic compounds (OC) /day; 7.28 tons OC /yr

(1) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for each day for this emissions unit:

a. the company identification for each clean-up material employed;

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

c. the OC content of each cleanup material, in lbs/gallon, as applied;

d. the OC emission rate for each cleanup material employed, in lbs/day [d)(1)b. x d)(1)c.]; and

e. the total OC emission rate for all cleanup materials employed [the summation of d)(1)d.], in lbs/day.

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

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

e) Reporting Requirements

(1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the emission limitations in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:
39.9 lbs OC /day

Applicable Compliance Method:
Compliance with the daily OC emission limit shall be based upon the record keeping requirements specified in section d)(1) of this permit.

b. Emission Limitation:
7.28 tons OC/yr

Applicable Compliance Method:
The annual OC emission limitation of 7.28 tons was developed by multiplying the allowable daily OC emission limitation of 39.9 pounds by the maximum operating schedule of 365 days/year and dividing by 2000 pounds/ton. Therefore, provided compliance with the daily limitation is maintained, compliance with the annual limitation shall also be demonstrated.

g) Miscellaneous Requirements

(1) None.

3. R018, Temper/silkscreen

Operations, Property and/or Equipment Description:

Silkscreening line with drying oven and tempering line

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. None.

(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. None.

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)	1.55 lbs organic compounds (OC)/hr; 6.80 tons OC/yr See c)(1).

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The permittee shall not employ any clean-up material containing organic compounds in this emissions unit. (Note: solvent clean-up done in emissions unit R017)

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for coating material usage in this emissions unit:

a. The company identification for each coating material employed;

b. The number of gallons of each coating material employed;

c. The OC compound content, in lbs/gallon, for each coating employed;

d. The OC emission rate for each coating employed, in lbs/month [d)(1)b. x d)(1)c.];

e. The total OC emission rate for all coating materials employed [summation of d)(1)e.];

f. The annual year-to-date OC emissions from all coatings employed [summation of d)(1)f. for each calendar month to date from January to December]; and

g. Documentation of whether or not each cleanup material employed contains organic compounds.

e) Reporting Requirements

(1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the emission limitations in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:
1.55 lbs OC /hr

Applicable Compliance Method:
The hourly OC emission limitation is based on the emission unit's potential to emit*. Therefore, no hourly record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with the limitation.

*The potential to emit for this emissions unit was based on a maximum OC content of 4.11 lbs/gallon and a maximum hourly usage rate of 0.378 gallons/hr.

b. Emission Limitation:
6.80 tons OC /yr

Applicable Compliance Method:
Compliance with the annual OC emission limitation shall be demonstrated based upon the record keeping requirements specified in section d)(1) of this permit.

g) Miscellaneous Requirements

(1) None.

4. R019, CPL5

Operations, Property and/or Equipment Description:

PL-5 line: consisting of a spray operation of a isopropyl alcohol, water, diatomaceous earth mixture, silkscreen machine and drying oven

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) through d)(6), and e)(3).

(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. None.

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)	3.04 lbs organic compounds (OC) /hr, 13.32 tons OC/year. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	See b)(2)b.
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)c.
d.	OAC rule 3745-31-05(F)	1.71 lbs particulate matter 10 microns or less (PM_{10}) /hr; 7.49 tons PM_{10} /yr, from emissions units R019 and R020 combined. Visible particulate emissions from the stack(s) serving this emissions unit shall not exceed 0% opacity, as a six-minute average. See b)(2)d.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-17-11(B)	See b)(2)e.
f.	OAC rule 3745-17-07(A)	See b)(2)e.
g.	ORC 3704.03(F)(4)(b) OAC rule 3745-114-01	See d)(3) through d)(6), and e)(3).

(2) Additional Terms and Conditions

a. In accordance with ORC 3704.03(T), this air contaminant source has the potential to emit, taking into account air pollution controls installed on the source, more than ten tons per year of VOC and as such shall meet the Best Available Technology (BAT) requirements of OAC rule 3745-31-05(A)(3) in effect as of January 1, 2006.

b. BAT requirements for this emissions unit have been determined to be compliance with the voluntary restrictions established in accordance with OAC rule 3745-31-05(F) [See b)(2)d.]. The voluntary restrictions were intentionally established to be consistent with the BAT requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 for two specific purposes as indicated below:

i. BAT requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 would be fulfilled by compliance with voluntary restrictions; and

ii. The emissions unit will avoid any BAT requirements under OAC rule 3745-31-05(A)(3), as effective 12/01/06 [See b)(2)c.].

The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective, November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

In should be noted that the requirements established pursuant to OAC rule 3745-31-05(F) will remain applicable after the above SIP revisions are approved by U.S. EPA.

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

BAT requirements under OAC rule 3745-31-05(A)(3)(a) do not apply to the PM10 emissions from the air contaminant source since the controlled potential to emit is less than ten tons per year taking into consideration practically and legally

enforceable voluntary restrictions established under OAC rule 3745-31-05(F) in this permit.

d. This permit establishes the following voluntary restrictions for the purpose of establishing legally and practically enforceable limitations representing the potential to emit (PTE). These emission limitations are established based on the operational restriction contained in c)(1) which require control equipment:

i. 1.71 lbs PM_{10} /hr; 7.49 tons PM_{10}/yr, combined for emissions unit R019 and R020.

ii. An associated 0% opacity as a six-minute average for application of water/alcohol/diatomaceous earth mixture.

All particulate matter emissions are PM_{10}.

e. The emission limitations established pursuant to this rule is less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(F).

c) Operational Restrictions

(1) The following operational restrictions has been included in this permit for the purpose of establishing legally and practically enforceable limitation requirements which limit PTE [See b)(2)b.]: The use of a baghouse achieving a maximum outlet concentration of 0.01 grains/dscf of PM_{10}.

(2) The permittee shall not employ any clean-up material containing organic compounds in this emissions unit. (Note: solvent clean-up is done in emissions unit R017)

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for the silkscreen coating and water/alcohol/diatomaceous earth coating operations:

a. the company identification for each silkscreen coating and water/alcohol/diatomaceous earth mixture employed in this emission unit;

b. the number of gallons of each silkscreen coating and water/alcohol/diatomaceous earth mixture employed;

c. the OC content of each silkscreen coating and water/alcohol/diatomaceous earth mixture , in lbs/gallon, as applied;

d. the total OC emission rate for each silkscreen coating and water/alcohol/diatomaceous earth mixture employed, in lbs/month [d)(1)b. x d)(1)c. for each silkscreen coating and water/alcohol/diatomaceous earth mixture employed];

e. the total OC emission rate for all silkscreen coating and water/alcohol/diatomaceous earth mixture employed, in lbs/month [summation of d)(1)d.];

f. the annual year to date OC emissions from all silkscreen coatings and water/alcohol/diatomaceous earth mixtures employed [sum of d)(1)e. for each calendar month to date from January to December]; and

g. documentation of whether or not each clean-up material employed contains organic compounds.

(2) The permittee shall properly install, operate, and maintain equipment to continuously monitor and the pressure drop, in inches of water, across the baghouse during the operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop on a daily basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the baghouse is 3 to 5 inches of water

This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

(3) The permit-to-install and operate (PTIO) application for emissions units R019 and R020, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit

application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

   i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

   ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "**X**" hours per day and "**Y**" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

   TLV/10 x 8/X x 5/Y = 4 TLV/XY = MAGLC

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

   Toxic contaminant: silver
   TLV (mg/m3): 0.01
   Maximum Hourly Emission Rate (lbs/hr): 1.84
   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1.84
   MAGLC (ug/m3): 2.38

The permittee, has demonstrated that emissions of silver, from emissions units R019 and R020, are calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall

not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

(4) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

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

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

(5) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F),

initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

(6) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

(1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

(2) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the baghouse during the 12-month reporting period for this/these emissions unit(s):

a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;

b. any period of time (start time and date, and end time and date) when the emissions units were in operation and the process emissions were not vented to the baghouse;

c. each incident of deviation described in e)(2)a. where a prompt investigation was not conducted;

d. each incident of deviation described in e)(2)a. where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. an identification of each incident of deviation described in e)(2)a. where proper records were not maintained for the investigation and/or the corrective action, as identified in the monitoring and record keeping requirements of this permit.

(3) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

f) Testing Requirements

(1) Compliance with the emission limitations in section b)(1) of this permit shall be determined in accordance with the following methods:

a. Emission Limitation:
3.04 lbs OC /hr

Applicable Compliance Method:
The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established adding the potential hourly emissions from the water/alcohol/diatomaceous earth operation to the potential hourly emissions from the silkscreen operation.

The potential to emit from the water/alcohol/diatomaceous earth operation was established by multiplying the maximum hourly coatings usage rate (0.91gallons per hour) by the maximum OC content of all the mixture (1.1 pounds per gallon)

The potential to emit from the silkscreen operation was established by multiplying the maximum hourly coatings usage rate (0.50 gallons per hour) by the worst case coating OC content (4.08 pounds per gallon)

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

b. Emission Limitation:
13.32 tons OC /year

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in section d)(1) of this permit.

c. Emission Limitation:
1.71 lbs PM_{10} /hr

Applicable Compliance Method:
Compliance with the hourly emission limitation shall be determined by multiplying the maximum outlet concentration of 0.01 grain PM10/dscf by a maximum volumetric air flow of 20,000 acfm, and applying the appropriate conversion factors of 7000 grains/lb, 1 dscf/1acfm, and 60 minutes/hr. (All emissions of particulate matter are PM10). If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 of 40 CFR Part 60, Appendix A and Methods 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

d. Emission Limitation:
7.49 tons PM_{10} /yr

Applicable Compliance Method:
The annual limitation shall be determined by multiplying the lb/hr PM_{10} limitation by a maximum operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall also be demonstrated.

e. Emission Limitation:
Visible particulate emissions from the stack(s) serving this emissions unit shall not exceed 0% opacity, as a six-minute average.

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with the visible emission limitation(s) listed above in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as specified in 40 CFR 60.303(b)(3).

f. Emission Limitation:
0.01 gr PM_{10} /dscf (stack)

Applicable Compliance Method:
The allowable PM_{10} limitation was established according to manufacturer specifications. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

g) Miscellaneous Requirements

(1) None.

5. R020, PL-4 silkscreen

Operations, Property and/or Equipment Description:

PL-4 line consisting of a spray operation of an isopropyl alcohol, water, diatomaceous earth mixture, silkscreen machine and drying oven

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) through d)(6), and e)(3).

(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. None.

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)	5.45 lbs organic compounds (OC) /hr, 23.87 tons OC /year. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	See b)(2)b.
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)c.
d.	OAC rule 3745-31-05(F)	1.71 lbs particulate matter 10 microns or less (PM_{10}) /hr; 7.49 tons PM_{10} /yr, from emissions units R019 and R020 combined. Visible particulate emissions from the stack(s) serving this emissions unit shall not exceed 0% opacity, as a six-minute average. See b)(2)d.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-17-11(B)	See b)(2)e.
f.	OAC rule 3745-17-07(A)	See b)(2)e.
g.	ORC 3704.03(F)(4)(b) OAC rule 3745-114-01	See d)(3) through d)(6), and e)(3).

(2) Additional Terms and Conditions

a. In accordance with ORC 3704.03(T), this air contaminant source has the potential to emit, taking into account air pollution controls installed on the source, more than ten tons per year of VOC and as such shall meet the Best Available Technology (BAT) requirements of OAC rule 3745-31-05(A)(3) in effect as of January 1, 2006.

b. BAT requirements for this emissions unit have been determined to be compliance with the voluntary restrictions established in accordance with OAC rule 3745-31-05(F) [See b)(2)d.]. The voluntary restrictions were intentionally established to be consistent with the BAT requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 for two specific purposes as indicated below:

i. BAT requirements under OAC rule 3745-31-05(A)(3), as effective 11/30/01 would be fulfilled by compliance with voluntary restrictions; and

ii. The emissions unit will avoid any BAT requirements under OAC rule 3745-31-05(A)(3), as effective 12/01/06 [See b)(2)c.].

The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective, November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

In should be noted that the requirements established pursuant to OAC rule 3745-31-05(F) will remain applicable after the above SIP revisions are approved by U.S. EPA.

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

BAT requirements under OAC rule 3745-31-05(A)(3)(a) do not apply to the PM10 emissions from the air contaminant source since the controlled potential to emit is less than ten tons per year taking into consideration practically and legally

enforceable voluntary restrictions established under OAC rule 3745-31-05(F) in this permit.

d. This permit establishes the following voluntary restrictions for the purpose of establishing legally and practically enforceable limitations representing the potential to emit (PTE). These emission limitations are established based on the operational restriction contained in c)(1) which require control equipment:

i. 1.71 lbs PM_{10} /hr; 7.49 tons PM_{10} /yr.

ii. An associated 0% opacity as a six-minute average for application of water/alcohol/diatomaceous earth mixture.

All particulate matter emissions are PM_{10}.

e. The emission limitations established pursuant to this rule is less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(F).

c) Operational Restrictions

(1) The following operational restrictions has been included in this permit for the purpose of establishing legally and practically enforceable limitation requirements which limit PTE [See b)(2)b.]: The use of a baghouse achieving a maximum outlet concentration of 0.01 grains/dscf of PM_{10}.

(2) The permittee shall not employ any clean-up material containing organic compounds in this emissions unit. (Note: solvent clean-up is done in emissions unit R017)

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for the silkscreen coating and water/alcohol/diatomaceous earth coating operations:

a. the company identification for each silkscreen coating and water/alcohol/diatomaceous earth mixture employed in this emission unit;

b. the number of gallons of each silkscreen coating and water/alcohol/diatomaceous earth mixture employed;

c. the OC content of each silkscreen coating and water/alcohol/diatomaceous earth mixture , in lbs/gallon, as applied;

d. the total OC emission rate for each silkscreen coating and water/alcohol/diatomaceous earth mixture employed, in lbs/month [d)(1)b. x d)(1)c. for each silkscreen coating and water/alcohol/diatomaceous earth mixture employed];

e. the total OC emission rate for all silkscreen coating and water/alcohol/diatomaceous earth mixture employed, in lbs/month [summation of d)(1)d.];

f. the annual year to date OC emissions from all silkscreen coatings and water/alcohol/diatomaceous earth mixtures employed [sum of d)(1)e. for each calendar month to date from January to December]; and

g. documentation of whether or not each clean-up material employed contains organic compounds.

(2) The permittee shall properly install, operate, and maintain equipment to continuously monitor and the pressure drop, in inches of water, across the baghouse during the operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop on a daily basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the baghouse is 3 to 5 inches of water

This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

(3) The permit-to-install and operate (PTIO) application for emissions units R019 and R020, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit

application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

   i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

   ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "**X**" hours per day and "**Y**" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

   TLV/10 x 8/X x 5/Y = 4 TLV/XY = MAGLC

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

   Toxic contaminant: silver
   TLV (mg/m3): 0.01
   Maximum Hourly Emission Rate (lbs/hr): 1.84
   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1.84
   MAGLC (ug/m3): 2.38

The permittee has demonstrated that emissions of silver, from emissions units R019 and R020, are calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be

applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

(4) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

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

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

(5) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F),

initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

(6) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

(1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

(2) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the baghouse during the 12-month reporting period for this/these emissions unit(s):

a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;

b. any period of time (start time and date, and end time and date) when the emissions units were in operation and the process emissions were not vented to the baghouse;

c. each incident of deviation described in e)(2)a. where a prompt investigation was not conducted;

d. each incident of deviation described in e)(2)a. where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. an identification of each incident of deviation described in e)(2)a. where proper records were not maintained for the investigation and/or the corrective action, as identified in the monitoring and record keeping requirements of this permit.

(3) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

f) Testing Requirements

(1) Compliance with the emission limitations in section b)(1) of this permit shall be determined in accordance with the following methods:

a. Emission Limitation:
5.45 lbs OC /hr

Applicable Compliance Method:
The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established adding the potential hourly emissions from the water/alcohol/diatomaceous earth operation to the potential hourly emissions from the silkscreen operation.

The potential to emit from the water/alcohol/diatomaceous earth operation was established by multiplying the maximum hourly coatings usage rate (2.1 gallons per hour) by the maximum OC content of all the mixture (1.1 pounds per gallon)

The potential to emit from the silkscreen operation was established by multiplying the maximum hourly coatings usage rate (0.77 gallons per hour) by the worst case coating OC content (4.08 pounds per gallon)

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

b. Emission Limitation:
23.87 tons OC /year

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in section d)(1) of this permit.

c. Emission Limitation:
1.71 lbs PM_{10} /hr

Applicable Compliance Method:
Compliance with the hourly emission limitation shall be determined determined by multiplying the maximum outlet concentration of 0.01 grain PM_{10} /dscf by a maximum volumetric air flow of 20,000 acfm, and applying the appropriate conversion factors of 7000 grains/lb, 1 dscf/1acfm, and 60 minutes/hr. (All emissions of particulate matter are PM_{10}). If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 of 40 CFR Part 60, Appendix A and Methods 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

d. Emission Limitation:
7.49 tons PM_{10} /yr

Applicable Compliance Method:
The annual limitation shall be determined by multiplying the lb/hr PM_{10} limitation by a maximum operating schedule of 8760 hrs/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance with the annual limitation shall also be demonstrated.

e. Emission Limitation:
Visible particulate emissions from the stack(s) serving this emissions unit shall not exceed 0% opacity, as a six-minute average.

Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with the visible emission limitation(s) listed above in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as specified in 40 CFR 60.303(b)(3).

f. Emission Limitation:
0.01 gr PM_{10} /dscf (stack)

Applicable Compliance Method:
The allowable PM_{10} limitation was established according to manufacturer specifications. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

g) Miscellaneous Requirements

(1) None.

6. Emissions Unit Group - Group A - Pre-prime Stations: R004, R006, R007,

EU ID	Operations, Property and/or Equipment Description
R004	Manual Pre-prime Station #1 for Encapsulation Process
R006	Robotic Pre-prime Station #3 for Encapsulation Process
R007	Robotic Pre-prime Station #4 for Encapsulation Process

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. None.

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)	4.1 lbs OC/day; 0.74 ton OC/yr from coating usage (for each emissions unit) 4.0 lbs OC/month; 0.024 ton OC/yr from cleanup operations (for each emissions unit)

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for each day for each emissions unit:

a. The company identification for each coating employed;

b. The number of gallons of each coating employed;

c. The OC content of each coating, in lbs/gallon;

d. The OC emission rate for each coating [d)(1)b. x d)(1)c.] in lbs/day;

e. The total OC emission rate for all coatings [the summation of d)(1)d. for all coatings] in lbs/day; and

f. The annual, year to date OC emissions from all coating materials employed [the summation of d)(1)e. for each calendar day to date from January to December].

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

(2) The permittee shall collect and record the following information for each month for the clean-up operations for each emissions unit:

a. The company identification for each cleanup material employed;

b. The number of gallons of each cleanup material employed;

c. The OC content of each cleanup material, in lbs/gallon;

d. The OC emissions rate for each cleanup material [d)(2)b. x d)(2)c.], in lbs/day;

e. The total OC emission rate for all cleanup materials [the summation of d)(1)d. for all cleanup materials], in lbs/month; and

f. The annual, year to date OC emissions from all cleanup materials employed [the summation of d)(2)e. for each calendar month to date from January to December].

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

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

(3) The permit to install (PTI) for these pre-prime, post-prime and spray mold release (emissions units R004-R012) 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 PTI 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 PTI 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" pollutants:

Pollutant: Toluene
TLV (ug/m3): 188,404.9
Maximum Hourly Emission Rate (lbs/hr): 1.156
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 772.3
MAGLC (ug/m3): 4,485.8

Pollutant: Methyl Ethyl Ketone (MEK)
TLV (ug/m3): 589,775
Maximum Hourly Emission Rate (lbs/hr): 0.915
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 681.8
MAGLC (ug/m3): 41,042

Pollutant: Methanol
TLV (ug/m3): 262,085
Maximum Hourly Emission Rate (lbs/hr): 0.256
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 170.4
MAGLC (ug/m3): 6,240

Pollutant: Hydrocarbon Naphtha
TLV (ug/m3): 1,398,773
Maximum Hourly Emission Rate (lbs/hr): 2.92
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,949
MAGLC (ug/m3): 33,304

(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 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 within a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (i.e., 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 PTI 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 PTI prior to the change.

(5) The permittee shall collect, record and retain the following information when it conductions 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 emission 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) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the allowable emission limitations in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:
4.1 lbs OC /day from coating usage (for each emissions unit)

Applicable Compliance Method:
Compliance with the daily OC emission limitation shall be based upon the record keeping requirements specified in d)(1) of this permit.

b. Emission Limitation:
0.74 tons OC /yr from coating usage (for each emissions unit)

Applicable Compliance Method:
Compliance with the annual OC emission limitation shall be based upon the record keeping requirements specified in d)(1) of this permit.

c. Emission Limitation:
4.0 lbs OC /month from cleanup materials (for each emissions unit)

Applicable Compliance Method:
Compliance with the monthly OC emission limitation shall be based upon the record keeping requirements specified in d)(2) of this permit.

d. Emission Limitation:
0.024 tons OC /yr from cleanup materials

Applicable Compliance Method:
Compliance with the OC emission limitation shall be based upon the record keeping requirements specified in d)(2) of this permit.

g) Miscellaneous Requirements

(1) None.

7. Emissions Unit Group - Group B - Spray Mold Release: R009, R010,

EU ID	Operations, Property and/or Equipment Description
R009	Spray Mold Release Operation #1 for Encapsulation Process
R010	Spray Mold Release Operation #2 for Encapsulation Process

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. None.

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)	1.52 lbs organic compounds (OC)/hr; 6.66 tons OC/yr, from mold release (for each emissions unit) 50 lbs OC/month; 0.30 ton OC/yr from cleanup operations (for each emissions unit)

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The use of coating material with a solids content exceeding 4.0% by volume is prohibited in this emissions unit group.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information for each emissions unit:

a. The company identification for each coating employed;

b. The percent solids content by volume, for each coating material employed;

c. The number of gallons of each coating employed;

d. The OC content of each coating, in lbs/gallon;

e. The OC emission rate for each coating [d)(1)c. x d)(1)d.] in lbs/day;

f. The total OC emissions rate for all coatings [the summation of d)(1)e.]; and

g. The annual year to date OC emissions from all coatings employed [the summation of d)(1)f. for each calendar month to date from January to December].

(2) The permittee shall collect and record the following information for each month for the clean-up operations for each emissions unit:

a. The company identification for each cleanup material employed;

b. The number of gallons of each cleanup material employed;

c. The OC content of each cleanup material, in lbs/gallon;

d. The OC emissions rate for each cleanup material [d)(2)b. x d)(2)c.], in lbs/day;

e. The total OC emission rate for all cleanup materials [the summation of d)(1)d. for all cleanup materials], in lbs/month; and

f. The annual, year to date OC emissions from all cleanup materials employed [the summation of d)(2)e. for each calendar month to date from January to December].

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

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

(3) The permit to install (PTI) for these pre-prime, post-prime and spray mold release (emissions units R004-R012) 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 PTI 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 PTI 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" pollutants:

Pollutant: Toluene
TLV (ug/m3): 188,404.9
Maximum Hourly Emission Rate (lbs/hr): 1.156
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 772.3
MAGLC (ug/m3): 4,485.8

Pollutant: Methyl Ethyl Ketone (MEK)
TLV (ug/m3): 589,775
Maximum Hourly Emission Rate (lbs/hr): 0.915
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 681.8
MAGLC (ug/m3): 41,042

Pollutant: Methanol
TLV (ug/m3): 262,085
Maximum Hourly Emission Rate (lbs/hr): 0.256
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 170.4
MAGLC (ug/m3): 6,240

Pollutant: Hydrocarbon Naphtha
TLV (ug/m3): 1,398,773
Maximum Hourly Emission Rate (lbs/hr): 2.92
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,949
MAGLC (ug/m3): 33,304

(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 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 within a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (i.e., 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 PTI 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 PTI prior to the change.

(5) The permittee shall collect, record and retain the following information when it conductions 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 emission 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) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the allowable emission limitations in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:
1.52 lb OC /hr (for each emissions unit)

Applicable Compliance Method:
The hourly OC emission limitation is based on the emission unit's potential to emit*. Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit for this emissions unit was based on a maximum OC content of 6.09 lbs OC/gallon and a maximum hourly usage rate of 0.25 gallons/hr.

b. Emission Limitation:
6.66 tons OC /yr (for each emissions unit)

Applicable Compliance Method:
Compliance with the annual OC emission limitation shall be based upon the record keeping requirements specified in section d)(1) of this permit.

c. Emission Limitation:
50 lbs OC /month from cleanup materials (for each emissions unit)

Applicable Compliance Method:
Compliance with the monly OC emission limitation shall be based upon the record keeping requirements specified in d)(2) of this permit.

d. Emission Limitation:
0.30 tons OC /yr from cleanup materials (for each emissions unit)

Applicable Compliance Method:
Compliance with the annual OC emission limitation shall be based upon the record keeping requirements specified in d)(2) of this permit.

g) Miscellaneous Requirements

(1) None.

8. Emissions Unit Group - Group C - Post-prime Stations: R011, R012, R013, R014, R015,

EU ID	Operations, Property and/or Equipment Description
R011	Manual Post-prime Station #1 for Encapsulation Process
R012	Manual Post-prime Station #2 for Encapsulation Process
R013	manual post-prime station no.3 for Encapsulation Process (modification to PTI 03-13467 issued 7/27/00 to decrease OC emission limitation)
R014	manual post-prime station no.4 for Encapsulation Process (modification to PTI 03-13467 issued 7/27/00 to decrease OC emission limitation)
R015	Manual Post-prime Station #5 for Encapsulation Process

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. None.

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)	9.12 lbs OC/day; 1.66 tons OC/yr from coating usage (for each emissions unit) 1.34 lbs OC/month; 0.008 ton OC/yr from cleanup operations (for each emissions unit)

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for each day for each emissions unit:

a. The company identification for each coating employed;

b. The number of gallons of each coating employed;

c. The OC content of each coating, in lbs/gallon;

d. The OC emission rate for each coating [d)(1)b. x d)(1)c.] in lbs/day;

e. The total OC emission rate for all coatings [the summation of d)(1)d. for all coatings] in lbs/day; and

f. The annual, year to date OC emissions from all coating materials employed [the summation of d)(1)e. for each calendar day to date from January to December].

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

(2) The permittee shall collect and record the following information for each month for each emissions unit:

a. The company identification for each cleanup material employed;

b. Then number of gallons of each cleanup material employed;

c. The OC content of each cleanup material, in lbs/gallon;

d. The OC emissions rate for each cleanup material [d)(2)b. x d)(2)c.], in lbs/day;

e. The total OC emission rate for all cleanup materials [the summation of d)(1)d. for all cleanup materials], in lbs/month; and

f. The annual, year to date OC emissions from all cleanup materials employed [the summation of d)(2)e. for each calendar month to date from January to December].

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

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

(3) The permit to install (PTI) for these pre-prime, post-prime and spray mold release (emissions units R004-R012) 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 PTI 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 PTI 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" pollutants:

Pollutant: Toluene
TLV (ug/m3): 188,404.9
Maximum Hourly Emission Rate (lbs/hr): 1.156
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 772.3
MAGLC (ug/m3): 4,485.8

Pollutant: Methyl Ethyl Ketone (MEK)
TLV (ug/m3): 589,775
Maximum Hourly Emission Rate (lbs/hr): 0.915
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 681.8
MAGLC (ug/m3): 41,042

Pollutant: Methanol
TLV (ug/m3): 262,085
Maximum Hourly Emission Rate (lbs/hr): 0.256
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 170.4
MAGLC (ug/m3): 6,240

Pollutant: Hydrocarbon Naphtha
TLV (ug/m3): 1,398,773
Maximum Hourly Emission Rate (lbs/hr): 2.92
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,949
MAGLC (ug/m3): 33,304

(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 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 within a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (i.e., 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 PTI 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 PTI prior to the change.

(5) The permittee shall collect, record and retain the following information when it conductions 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 emission 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) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the allowable emission limitations in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:
9.12 lbs OC /day from coating usage (for each emissions unit)

Applicable Compliance Method:
Compliance with the daily OC emission limit shall be based upon the record keeping requirements contained in section d)(1) of this permit.

b. Emission Limitation:
1.66 tons OC /yr from coating usage (for each emissions unit)

Applicable Compliance Method:
Compliance with the annual OC emission limit shall be based upon the record keeping requirements contained in section d)(1) of this permit.

c. Emission Limitation:
1.34 lbs OC /month from cleanup materials (for each emissions unit)

Applicable Compliance Method:
Compliance with the month OC emission limit shall be based upon the record keeping requirements contained in section d)(2) of this permit.

d. Emission Limitation:
0.008 tons OC /yr from cleanup materials (for each emissions unit)

Applicable Compliance Method:
Compliance with the annual OC emission limit shall be based upon the record keeping requirements contained in section d)(2) of this permit.

g) Miscellaneous Requirements

(1) None.