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

Certified Mail

8/17/2011

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

William Ludwig
SAJAR PLASTICS
15285 South State Ave
MIDDLEFIELD, OH 44062

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0228000127
Permit Number: P0107968
Permit Type: Renewal
County: Geauga

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, Northeast District Office at (330)425-9171 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-NEDO

Response to Comments

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

Facility ID:	0228000127
Facility Name:	SAJAR PLASTICS
Facility Description:	
Facility Address:	15285 SOUTH STATE STREET MIDDLEFIELD, OH 44062 Geauga County
Permit #:	P0107968, Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Plain Dealer on 07/14/2011. The comment period ended on 08/13/2011.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

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

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

1. Topic: **None**
    a. Comment: **None**
    b. Response: **None**
2. Topic: **None**
    a. Comment: **None**
    b. Response: **None**

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
SAJAR PLASTICS

Facility ID:	0228000127
Permit Number:	P0107968
Permit Type:	Renewal
Issued:	8/17/2011
Effective:	8/17/2011
Expiration:	8/17/2016

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
SAJAR PLASTICS

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Authorization

Facility ID: 0228000127
Application Number(s): A0041468
Permit Number: P0107968
Permit Description: Renewal FEPTIO for emissions units R007 - R016, surface coating operations for plastic parts and products.
Permit Type: Renewal
Permit Fee: $0.00
Issue Date: 8/17/2011
Effective Date: 8/17/2011
Expiration Date: 8/17/2016
Permit Evaluation Report (PER) Annual Date: July 1 - June 30, Due Aug 15

This document constitutes issuance to:

SAJAR PLASTICS
15285 SOUTH STATE STREET
MIDDLEFIELD, OH 44062

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, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)425-9171

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: P0107968
Permit Description: Renewal FEPTIO for emissions units R007 - R016, surface coating operations for plastic parts and products.

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

Group Name: Paint Spray Booths

Emissions Unit ID:	**R007**
Company Equipment ID:	Paint Spray Booth #44A
Superseded Permit Number:	P0084544
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R008**
Company Equipment ID:	Paint Spray Booth #44B
Superseded Permit Number:	P0084544
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R009**
Company Equipment ID:	Paint Spray Booth #45
Superseded Permit Number:	P0084544
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R010**
Company Equipment ID:	Paint Spray Booth #46
Superseded Permit Number:	P0084544
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R011**
Company Equipment ID:	Paint Spray Booth #47
Superseded Permit Number:	P0084544
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R012**
Company Equipment ID:	Paint Spray Booth #48
Superseded Permit Number:	P0084544
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R013**
Company Equipment ID:	Paint Spray Booth #49
Superseded Permit Number:	P0084544
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R014**
Company Equipment ID:	Paint Spray Booth #50A
Superseded Permit Number:	P0084544
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R015**
Company Equipment ID:	Paint Spray Booth #50B
Superseded Permit Number:	P0084544
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R016**
Company Equipment ID:	Paint Spray Booth #52
Superseded Permit Number:	P0084544
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, Northeast 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. Emissions Unit Group - Paint Spray Booths: R007, R008, R009, R010, R011, R012, R013, R014, R015, R016,

EU ID	Operations, Property and/or Equipment Description
R007	Paint Spray Booth #44A for surface coating plastic parts and products.
R008	Paint Spray Booth #44B for surface coating plastic parts and products.
R009	Paint Spray Booth #45 for surface coating plastic parts and products.
R010	Paint Spray Booth #46 for surface coating plastic parts and products.
R011	Paint Spray Booth #47 for surface coating plastic parts and products.
R012	Paint Spray Booth #48 for surface coating plastic parts and products.
R013	Paint Spray Booth #49 for surface coating plastic parts and products.
R014	Paint Spray Booth #50A for surface coating plastic parts and products.
R015	Paint Spray Booth #50B for surface coating plastic parts and products.
R016	Paint Spray Booth #52 for surface coating plastic parts and products.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)g, d)(1), d)(2), d)(3), d)(4) and e)(1).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)f, b)(2)e, b)(2)f, d)(6), e)(4), f)(1)d and f)(1)e

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 3745-17-17(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
b.	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 0.551 pound per hour.

c.	OAC rule 3745-21-07(G)(2)	The emission limitations required by this applicable rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05 (A)(3). See b)(2)a.
d.	OAC rule 3745-21-07(M)	See b)(2)b.
e.	OAC rule 3745-31-05(A)(3) PTI 02-12102	See b)(2)c and b)(2)d.
f.	OAC rule 3745-31-05(D)(1)(b)	See b)(2)e and b)(2)f.
g.	ORC 3704.03(F)	See d)(1), d)(2), d)(3), d)(4) and e)(1).
h.	40 CFR Part 60, Subpart TTT	See b)(2)g and b)(2)h.
i.	OAC rule 3745-17-11(C)	See b)(2)i.

(2) Additional Terms and Conditions

a. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(1)c and b)(2)a.

b. In accordance with OAC rule 3745-21-07(M)(3)(a), OAC rule 3745-21-07(M)(2) is not applicable because these emissions units are not equipped with OC emission control devices.

c. Organic compound (OC) emissions generated from each emissions unit shall not exceed 8 pounds per hour and 40 pounds per day.

d. Particulate emissions generated from each emissions unit shall not exceed 2.41 tons per year.

e. The permittee shall not exceed the following facility-wide emission limitations:

i. 1,650 pounds per month of each individual hazardous air pollutant (HAP); and

ii. 4,150 pounds per month of total combined HAPs.

f. OC emissions generated from each emissions unit shall not exceed 7.30 tons per year.

g. In accordance with 40 CFR §60.722, the permittee shall not cause the discharge into the atmosphere in excess of the following for coating plastic parts for business machines, as defined in 40 CFR §60.721:

i. 1.5 kilograms of VOC per liter of coating solids applied from prime coating or color coating; and

ii. 2.3 kilograms of VOC per liter of coating solids applied from texture coating or touch-up coating.

h. All VOC emissions that are caused by coating applied in each emissions unit in which plastic parts for use in the manufacture of business machines receive prime coats, color coats, texture coats, or touch-up coats, regardless of the actual point of discharge of emissions into the atmosphere, shall be included in determining compliance with the emission limits in b)(2)g.

i. In accordance with OAC rule 3745-17-11(C)(3), each emissions unit shall comply with particulate emission limitation identified in PTI 02-12102, issued final on March 3, 1999, based on best available technology (BAT) instead of OAC rule 3745-17-11(C)(1) and (C)(2).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) Emissions units R007, R008, R009, R010, R011, R012, R013, R014, R015, and R016 were evaluated, in PTI No. 02-12102, based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions unit 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 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 results 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 or "worst case" toxic contaminant(s):

i. Compound: Methyl isobutyl ketone (MIBK)

TLV (mg/m3): 204.82618

Maximum Hourly Emission Rate (lbs/hr): 9.5

Predicted 1-Hour Maximum Ground Level Concentration (µg/m^3): 195.3

MAGLC (µg/m3): 4,876.81

ii. Compound: Methanol

TLV (mg/m3): 262.0858896

Maximum Hourly Emission Rate (lbs/hr): 11.6

Predicted 1-Hour Maximum Ground Level Concentration (µg/m^3): 238.5

MAGLC (µg/m3): 6,240.140

The permittee, has demonstrated that emissions of methyl isobutyl ketone and methanol from these emissions units are calculated to be less than eighty percent 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).

(2) Prior to making any physical changes to or changes in the method of operation of these emissions units, 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”, ORC 3704.03(F), will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a “modification”, the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions units, 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.

(3) 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.

(4) 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.

(5) The permittee shall collect and record the following information each day for each emissions unit, when the emissions unit is in operation:

a. the company identification for each coating and cleanup material employed;

b. the number of gallons of each coating and cleanup material employed minus the number of gallons of each coating and cleanup material recovered for disposal;

c. the OC content of each coating and cleanup material, in pounds OC per gallon;

d. the total OC emissions from all the coatings and cleanup materials, in pounds per day, i.e., the summation of the products of "b" times "c" for each coating and cleanup material;

e. the total number of hours the emissions unit was in operation; and

f. the average hourly OC emission rate for all the coatings and cleanup materials, i.e., (d)/(e), in pounds per hour.

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

(6) The permittee shall calculate and record the following facility-wide information each month:

a. the company identification for each coating and cleanup material employed;

b. the volume, in gallons, of each coating and cleanup material employed;

c. each individual HAP content for each coating and cleanup material applied, in pounds per gallon;

d. the total emissions of each individual HAP from all coatings and cleanup materials applied, i.e., the summation of the products of "b" times "c" for each individual coating and cleanup material applied, in pounds per month;

e. the total combined HAPs content for each coating and cleanup material applied, in pounds per gallon; and

f. the total emissions of total combined HAPs from all coatings and cleanup materials applied, i.e., the summation of the products of "b" times "e" for each individual coating and cleanup material applied, in pounds per month.

(7) In accordance with 40 CFR §60.723(b), the permittee shall conduct a performance test each nominal 1-month period according to the following when coating plastic parts of business machines:

a. The permittee shall determine the composition of coatings by analysis of each coating, as received, using US EPA Method 24, from data that have been determined by the coating manufacturer using US EPA Method 24, or by other methods approved by the Administrator of US EPA.

b. The permittee shall determine the volume of coating and the mass of VOC used for dilution of coatings from company records during each nominal 1-month period.

i. The permittee shall calculate the volume-weighted average mass of VOC's in coatings emitted per unit volume of coating solids applied (N) at each coating operation [i.e., for each type of coating (prime, color, texture, and touch-up) used] during each nominal 1-month period. Each 1-month calculation is considered a performance test. Except as provided in section d)(7)b.iii below, N will be determined by the following procedures:

(a) Calculate the mass of VOC's used (M_o + M_d) for each coating operation by the following:

$$(\mathrm{M}_0 + \mathrm{M}_d) = \sum_{i=1}^{\mathrm{n}}(\mathrm{L}_{ci}\mathrm{D}_{ci}\mathrm{W}_{oi}) + \sum_{j=1}^{m}(L_{dj}D_{\mathrm{dj}})$$

where:

M_o = the proportion of VOC's consumed, kilograms;

M_d = the mass of diluents VOC's consumed, kilograms;

L_{ci} = the volume of each coating consumed, as received, liters;

D_{ci} = the density of each coating as received, kilograms per liter;

W_{0i} = the proportion of VOC's in each coating, as received, fraction by weight;

D_{dj} = the density of each diluents of VOC, kilograms per liter;

L_{dj} = the volume of each diluents VOC added to coatings, liters

n = the total number of different coatings;

i = subscript denoting an individual coating;

m = the total number of different diluents VOC's; and

j = subscript denoting an individual diluents VOC's.

(b) Calculate the total volumes of coating solids consumed (L_s) in each nominal 1-month period for each coating operation by the following:

$L_s = \sum_{i=1}^{n}(L_{ci}V_{si})$

where:

L_s = the volume of coating solids consumed, liters;

V_{si} = the proportion of solids in each coating, as received, fraction by volume;

i = subscript denoting an individual coating; and

n = the total number of different coatings.

(c) Select the appropriate transfer efficiency (T) from Table 1 of 40 CFR Part 60, Subpart TTT, for each type of coating applications equipment used at each coating operation.

(d) Where more than one application method is used within a single coating operation, the permittee shall determine the volume of each coating applied by each method through a means acceptable to the US EPA and compute the volume-weighted average transfer efficiency by the following equation:

$T_{avg} = [\sum_{i=1}^{n} \quad \sum_{k=1}^{p}(L_{cik}V_{sik}T_k)]$

where:

T_{avg} = the volume-weighted average transfer efficiency for a coating operation (fraction);

k = subscript denoting an individual application method; and

p = the total number of different application methods used.

(e) Calculate the volume-weighted average mass of VOC's emitted per unit volume of coating solids applied (N) during each nominal 1-month period for each coating operation by the following:

$N = (M_o + M_d) / (L_s T_{avg})$

ii. Where the volume-weighted average mass of VOC's emitted to the atmosphere per unit volume of coating solids applied (N) is less than or equal to limitations in section b)(2)g above, the permittee is in compliance.

iii. If each individual coating used by the permittee has a VOC content (kg VOC/l of solids), as received, which when divided by the lowest transfer

efficiency at which the coating is applied for each coating operation is applied for each coating operation results in a value equal to or less than the limitations in section b)(2)g above, the permittee is in compliance provided that no VOC's are added to the coatings during distribution or application.

(8) The permittee, in accordance with 40 CFR §60.724(d), shall maintain at the facility, for a period of at least 2 years, records of all data and calculations used to determine monthly VOC emissions, as required in section d)(7) above, from each coating operation of each emissions unit.

e) Reporting Requirements

(1) 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 quarterly deviation (excursion) reports. 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.

(2) The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for each emissions unit in the annual Fee Emission Report.

(3) 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 PER shall cover a reporting period of no more than 12-months for each air contaminant source identified in this permit.

(4) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. the facility-wide emissions of each individual HAP shall not exceed 1,650 pounds per month;

ii. the facility-wide emissions of total combined HAPs shall not exceed 4,150 pounds per month; and

iii. OC emissions generated from each emissions unit shall not exceed 7.30 tons per year.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

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

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

(5) The permittee, in accordance with 40 CFR §60.724(b), shall submit the following:

a. Report the volume-weighted average mass of VOC's per unit volume of coating solids applied for each coating operation for each emissions unit during each nominal 1-month period in which the emissions unit is not in compliance with the applicable emission limits specified in section b)(1)h above. Reports of non-compliance shall be submitted on a quarterly basis, occurring every 3 months following the initial report; and

b. Statements that the facility has been in compliance with the application emission limits specified in b)(1)h during each nominal 1-month period. Statements of compliance shall be submitted on a semiannual basis.

The reports shall be postmarked, in accordance with 40 CFR §60.724(c), not later than 10 days after the end of the periods specified in e)(5)a and e)(5)b.

f) Testing Requirements

(1) Compliance with the emission limitations specified in b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitations:</u>

OC emissions generated from each emissions unit shall not exceed 8 pounds per hour and 40 pounds per day.

<u>Applicable Compliance Method:</u>

Compliance with the daily and hourly allowable OC emission limitations shall be demonstrated based upon the record keeping requirements specified in d)(5).

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

b. Emission Limitation:

OC emissions generated from each emissions unit shall not exceed 7.30 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(5)d and shall be the summation of the calendar year divided by 2000 lbs/ton.

c. Emission Limitation:

Particulate emissions from each emissions unit shall not exceed 0.551 pound per hour.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the worst case emission rate by using the following equation:

E_P = (MCSUR)(1 – TE)(1 – CE)

where:

E_P = Particulate emission rate, in pound per hour;

MCSUR = maximum coating solids usage rate, in pound per hour;

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used; and

CE = control efficiency of the control equipment.

If required, compliance with the hourly limitation shall be demonstrated based upon the methods and procedures specified in OAC rule 3745-17-03(B)(10).

d. Emission Limitation:

Facility-wide emissions of each individual HAP shall not exceed 1,650 pounds per month.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(6)d.

e. Emission Limitation:

Facility-wide emissions of total combined HAPs shall not exceed 4,150 pounds per month.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(6)f.

f. Emission Limitation:

In accordance with 40 CFR §60.722, the permittee shall not cause the discharge into the atmosphere in excess of the following for coating plastic parts for business machines, as defined in 40 CFR §60.721:

i. 1.5 kilograms of VOC per liter of coating solids applied from prime coating or color coating; and

ii. 2.3 kilograms of VOC per liter of coating solids applied from texture coating or touch-up coating.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(7).

g. Emission Limitation:

Particulate emissions generated from each emissions unit shall not exceed 2.41 tons per year

Applicable Compliance Method:

The tons per year emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.551 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

h. Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided in the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and OAC rule 3745-17-03(B)(1).

(2) In accordance with 40 CFR §60.725(a), the reference methods in Appendix A to 40 CFR Part 60, Subpart TTT, except as provided under 40 CFR §60.8(b) shall be used to determine compliance with the emission limitations in b)(2)g as follows:

a. Method 24 for determination of VOC content of each coating as received; and

b. For Method 24, the sample must be at least a 1-liter sample in a 1-liter container.

(3) In accordance with 40 CFR §60.725(b), other methods may be used to determine the VOC content of each coating if approved by the US EPA Administrator before testing.

g) Miscellaneous Requirements

(1) The permittee shall conduct an initial compliance test, as specified in 40 CFR Part 60, Subpart TTT, for any new coatings employed in the facility. Records of such shall be maintained on the premises and made available to any representative of the Director during normal business hours.