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

10/14/2011

Pamela Blakley *Via E-Mail Notification*
United States Environmental Protection Agency
Mail Code: AR-18J
77 West Jackson Blvd.

Chicago, IL 60604-3507

RE: PROPOSED AIR POLLUTION TITLE V PERMIT
Facility Name: Green Tokai Company
Facility ID: 0857011823
Permit Type: Renewal
Permit Number: P0107693

Dear Ms. Blakley:

A proposed OAC Chapter 3745-77 Title V permit for the referenced facility has been issued for review by U.S. EPA. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page http://www.epa.ohio.gov/dapc in Microsoft Word and Adobe Acrobat format. If U.S. EPA does not object to this proposed permit, the permit will be processed for issuance as a final action not less than 45 days from the date of this letter. Please contact me at (614) 644-3631 by the end of the 45 day review period if you wish to object to the proposed permit.

Sincerely,

Michael W. Ahern

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

Cc: Regional Air Pollution Control Agency

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

614 | 644 3020
614 | 644 3184 (fax)
www.epa.ohio.gov

Ohio | Environmental Protection Agency

PROPOSED

Division of Air Pollution Control
Title V Permit
for
Green Tokai Company

Facility ID:	0857011823
Permit Number:	P0107693
Permit Type:	Renewal
Issued:	10/14/2011
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Title V Permit
for
Green Tokai Company

Table of Contents

Authorization 1
A. Standard Terms and Conditions 2
1. Federally Enforceable Standard Terms and Conditions 3
2. Monitoring and Related Record Keeping and Reporting Requirements 3
3. Scheduled Maintenance 6
4. Risk Management Plans 6
5. Title IV Provisions 7
6. Severability Clause 7
7. General Requirements 7
8. Fees 8
9. Marketable Permit Programs 8
10. Reasonably Anticipated Operating Scenarios 8
11. Reopening for Cause 9
12. Federal and State Enforceability 9
13. Compliance Requirements 9
14. Permit Shield 11
15. Operational Flexibility 11
16. Emergencies 11
17. Off-Permit Changes 11
18. Compliance Method Requirements 12
19. Insignificant Activities or Emissions Levels 12
20. Permit to Install Requirement 12
21. Air Pollution Nuisance 13
22. Permanent Shutdown of an Emissions Unit 13
23. Title VI Provisions 13
24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only 14
25. Records Retention Requirements Under State Law Only 14
26. Inspections and Information Requests 14
27. Scheduled Maintenance/Malfunction Reporting 14
28. Permit Transfers 15

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations 15

B. Facility-Wide Terms and Conditions..... 16

C. Emissions Unit Terms and Conditions 19

1. P022, PVC LINE 5 PRIMER..... 20
2. P053, TPO #2 ADHESIVE 23
3. Emissions Unit Group - Group 1: P010, P026, P028,..... 27
4. Emissions Unit Group - coating misc. metals parts: P005, P023, P029,..... 32
5. Emissions Unit Group - injection molding: P034, P035, P036, P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048, P049. 38
6. Emissions Unit Group - silicone spray station: P051, P052, ... 43
7. Emissions Unit Group - silicone weather seal line: P003, P012,..... 48

Authorization

Facility ID: 0857011823
Facility Description: Plastic products
Application Number(s): A0041330
Permit Number: P0107693
Permit Description: Renewal Title V permit for Green Tokai Company which includes injection molding of plastic side molding lines, silicone coating of extruded rubber, coating of plastic parts, coating of misc. metal parts.
Permit Type: Renewal
Issue Date: 10/14/2011
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0092536

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Green Tokai Company
55 ROBERT WRIGHT DRIVE
Brookville, OH 45309-1902

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

Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280
(937)225-4435

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Regional Air Pollution Control Agency. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or

local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed

adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

(4) Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

(5) Reports of any required monitoring and/or record keeping information shall be submitted to Regional Air Pollution Control Agency.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. General Requirements

a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminent sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c) The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. An identification of each term or condition of this permit that is the basis of the certification.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittent.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

25. Records Retention Requirements Under State Law Only

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

(Authority for term: OAC rule 3745-77-07(C))

27. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air

pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or

c) where the company's responsible official has certified that an emissions unit has been permanently shut down.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

2. The following insignificant emissions units are located at this facility:

   None

   Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified Permit to Install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the federally-approved versions of OAC Chapters 3745-17, 3745-18, and/or 3745-21.

   [Authority for Term: OAC rule 3745-77-07(A)(13)]

3. The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 tons/year for any single HAP and 24.9 tons/year for any combination of HAPs, based on rolling, 12-month summations.

   [Authority for Term: OAC rule 3745-77-07(A)(1)]

4. The permittee shall collect and record the following information each month for all materials containing any hazardous air pollutant (HAP)* that are applied in the facility:

   a. the name and identification number/code of each coating, thinner, additive, cleanup material, and any other material containing any HAP;

   b. the name/identification of each individual HAP contained in each material applied (and identified in a.) and the pound(s) of each HAP per gallon of each HAP-containing material applied;

   c. the number of gallons of each coating, thinner, additive, cleanup material, and other material applied during the month;

   d. for each individual HAP, the total emissions from all the materials employed, in ton(s), i.e., for each individual HAP, the summation of the products of b. times c. for all the materials applied during the month, divided by 2,000 pounds;

   e. the total combined HAPs emissions from all the materials employed during the month, in ton(s), i.e., the summation of all the individual HAPs emissions from d.;

   f. for each individual HAP, the total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in d., for the present month plus the previous 11 months of operation, in ton(s); and

   i. The total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in e., for the present month plus the previous 11 months of operation, in ton(s).

*A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings and cleanup materials

[Authority for Term: OAC rule 3745-77-07(B)(1)]

5. The permittee shall submit quarterly deviation (excursion) reports that identify the following information:

   a. all exceedances of the rolling, 12-month individual HAP emission limitation for each HAP for all the coatings, thinners, additives, and cleanup materials employed; and

   b. all exceedances of the rolling, 12-month total combined HAPs emission limitation for all the coatings, thinners, additives, and cleanup materials employed.

   [Authority for Term: OAC rule 3745-77-07(B)(1)]

6. The permittee shall submit annual reports that specify the individual and/or combined HAP emissions from the facility for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including the specific emission data from this facility in the annual Fee Emission Report.

   [Authority for Term: OAC rule 3745-77-07(B)(1)]

7. Compliance with the emission limitations in B.3 shall be determined in accordance with the following methods:

   a. Emission Limitation:

      9.9 tons for each individual HAP/rolling, 12-month period

Applicable Compliance Method:

Compliance with the annual allowable individual HAP emission limitation above shall be based upon the record keeping requirements specified in B.4.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

   b. Emission Limitation:

      24.9 tons for all HAPs combined/rolling, 12-month period

   Applicable Compliance Method:

   Compliance with the annual allowable combined HAPs emission limitation above shall be based upon the record keeping requirements specified in B.4

C. Emissions Unit Terms and Conditions

1. P022, PVC LINE 5 PRIMER

Operations, Property and/or Equipment Description:

PVC LINE #5 PRIMER; COATING OF PLASTIC PARTS WITH PRIMER

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

(1) None.

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) PTI 08-3427 issued 12/28/1995	The emissions of Organic Compound (OC) from this emissions unit shall not exceed 1.67 lbs/hrfrom coatings and 2.17 tons/year from coatings and cleanupmaterials. See b)(2)a.

(2) Additional Terms and Conditions

a. The hourly OC emissions limit was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this short term emissions limitation.

b. The requirements of OAC rule 3745-21-07(M) are not applicable because there is no control device for this emissions unit.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information month for these emissions units:

a. The company identification for each coating employed.

b. The volume, in gallons, for each coating employed.

c. The OC content for each coating employed, as applied, in pounds per gallon.

d. The total OC emission rate for all the coatings employed, in pounds, i.e. summation of d)(1)b. x d)(1)c. for all coatings.

e. The company identification of each cleanup material employed.

f. The cleanup material usage rate for each month.

g. The OC content for each cleanup material employed, in pounds per gallon.

h. The total OC emissions from all cleanup materials employed, in pounds, i.e., summation of d)(1)f. x d)(1)g. for each cleanup material employed.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-3427]

(2) The permittee shall calculate and record the annualOCemissions, i.e., the sum of the monthly OC emissions from the coating material, as recorded in d)(1)d., plus the monthly emissions from all cleanup materials applied, as recorded in d)(2)h.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-3427]

e) Reporting Requirements

(1) The permittee shall submit annual reports that specify the total actual annual OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15th of each year. This reporting requirement may be satisfied by including and identifying the specific emissions data from this emissions unit in the annual Fee Emissions Report.

[Authority for Term: OAC rule 3745-77-07(C)(1)and PTI 08-3427]

(2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-3427]

f) Testing Requirements

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

a. <u>Emissions Limitation</u>:

The emissions of OC from this emissions unit shall not exceed1.67lbs/hr from coatings.

Applicable Compliance Method:

The hourly allowable OC emissions limitation was established by multiplying the maximum OC content of all the coatings (lbs OC/gallon) by the maximum coating application rate (gallons/hr).

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

[Authority for Term: OAC rule 3745-77-07(C)(1)and PTI 08-3427]

b. Emissions Limitation:

The emissions of OC from this emissions unit shall not exceed2.17 tons/yr from coatings and cleanup materials.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(2).

[Authority for Term: OAC rule 3745-77-07(C)(1)and PTI 08-3427]

(2) Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup.

[Authority for Term: OAC rule 3745-77-07(C)(1)and PTI 08-3427]

g) Miscellaneous Requirements

(1) None.

2. P053, TPO #2 ADHESIVE

Operations, Property and/or Equipment Description:

TPO Line 2 Metal Adhesive

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

(1) None.

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) PTI 08-04672 issued 06/16/2005	The emissions of Volatile Organic Compound (VOC) from this emissions unit shall not exceed 2.21 lbs/hr and 53.12 lbs/day from coatings. See b)(2)a The requirements established pursuant to this rule also include the requirements of OAC rule 3745-21-09(U)(2)(e)(i) and OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Major New Source Review) PTI 08-04672 issued 06/16/2005	The emissions of Volatile Organic Compound (VOC) from this emissions unit shall not exceed 4.0 tons/yr,based upon a rolling, 12-month summation of the monthly emissions.
c.	OAC rule 3745-21-09(U)(2)(e)(i)	The permittee shall not use more than 8 gallons of coating material per day for the coating of miscellaneous metal parts.

(2) Additional Terms and Conditions

a. The hourly VOC emissions limit was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this short term emissions limitation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

a. The company identification for each coating employed.

b. The volume, in gallons, for each coating employed.

c. The total volume, in gallons, for all the coatings employed.

d. The VOC content for each coating employed, as applied, in pounds per gallon.

e. The total VOC emission rate for all the coatings employed, in pounds i.e. summation of d)(1)b .x d)(1)d. for allcoatings.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672].

(2) The permittee shall maintain monthly records of the following information:

a. The company identification of each cleanup material employed.

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

c. The VOC content of each cleanup material employed, in pounds per gallon

d. The total VOC emissions from all cleanup materials employed, in pounds, i.e., summation of d)(2)b. x d)(2)c. for each cleanup material employed.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

(3) The permittee shall calculate and maintain monthly records of the VOCemissions and the rolling 12-monthemissions of VOC.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

e) Reporting Requirements

(1) The permittee shall notify the Director (DO/LAA) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage restriction of 8 gallons. The notification shall include a copy of such record and shall be sent to the Director (DO/LAA) within 45 days after the exceedance occurs.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

(2) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-monthemissions limitation for VOC.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

(4) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

f) Testing Requirements

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

a. Emissions Limitation:

The emissions of VOC from this emissions unit shall not exceed 2.21 lbs/hr from coatings.

Applicable Compliance Method:

The hourly allowable VOC emissions limitations were established by multiplying the maximum VOC content of all the coatings (lbs VOC/gallon) by the maximum coating application rate (gallons/hr).

If required, the hourly allowable VOC limitation shall be determined in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

[Authority for Term: OAC rule 3745-77-07(C)(1)and PTI 08-04672]

b. Emissions Limitation:

The emissions of VOC from this emissions unitshall not exceed 53.12 lbs/dayfrom coatings.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(1).

[Authority for Term: OAC rule 3745-77-07(C)(1)and PTI 08-04672]

c. Emissions Limitation:

The permittee shall not use more than 8 gallons of coating material per day for the coating of miscellaneous metal parts.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(1).

[Authority for Term: OAC rule 3745-77-07(C)(1)and PTI 08-04672]

d. Emissions Limitation:

The emissions of VOC from this emissions unit shall not exceed 4.0 tons/yr, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(3).

[Authority for Term: OAC rule 3745-77-07(C)(1)and PTI 08-04672]

(2) Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup.

[Authority for Term: OAC rule 3745-77-07(C)(1)and PTI 08-04672]

g) Miscellaneous Requirements

(1) Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air ToxicPolicy was not necessary since the emissions unit's maximum annual emissions for each toxic compound willbe less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modifiedpermit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is herebyadvised that changes in the composition of the materials or use of new materials, that would result in anincrease in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require thepermittee to apply for and obtain a new permit to install.

[Authority for Term: OAC rule 3745-77-07(C)(1)and PTI 08-04672]

3. Emissions Unit Group -Group 1: P010, P026, P028,

EU ID	Operations, Property and/or Equipment Description
P010	500E PVC INJECTION MOLDING
P026	PVC Line 9 Primer; coating of plastic parts with primer
P028	PVC Line 10 Primer; coating of plastic parts with primer

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

(1) None.

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) PTI 08-04434 issued 09/17/2002	<u>For emissions unit P010</u>: The emissions of Organic Compound (OC) from this emissions unit shall not exceed 1.67 lbs/hr from coatings and 7.3 tons/year from coatings and cleanupmaterials. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3) PTI 08-04346 issued 04/06/2006	<u>For emissions unit P026 and P028</u>: The emissions of OC from each of these emissions units shall not exceed 1.7 lbs/hr from coatings and 4.3 tons/year from coatings and cleanupmaterials. See b)(2)a
c..	Compliance with Ohio EPA's "Air Toxic Policy"	See d)(4) through d)(6).

(2) Additional Terms and Conditions

a. The hourly OC emissions limits were established to reflect the potential to emit for these emissions units. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these short term emissions limitations.

b. The requirements of OAC rule 3745-21-07(M) are not applicable because there is no control device for this emissions unit.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for these emissions units:

a. The name and identification number of each coating employed.

b. The OC content of each coating employed, in pounds per gallon, as applied.

c. The number of gallons of each coating employed.

d. The total OC emissions from all the coatings employed, in pounds, i.e., the sum of d)(1)b. times d)(1)c. for each coating employed.

e. The company identification of each cleanup material employed.

f. The number of gallons of each cleanup material employed.

g. TheOC content of each cleanup material employed, in pounds per gallon.

h. The total OC emissions from all cleanup materials employed, in pounds, i.e., summation of d)(1)f. x d)(1)g. for each cleanup material employed.

[Authority for Term: OAC rule 3745-77-07(C)(1), PTI 08-04434 and PTI 08-04346]

(2) The permittee shall calculate and record the annualOCemissions, i.e., the sum of the monthly OC emissions from the coating material, as recorded in d)(1)d., plus the monthly emissions from all cleanup materials applied, as recorded in d)(1)h.

[Authority for Term: OACrule 3745-77-07(C)(1), PTI 08-04434 and PTI 08-04346]

(3) The permit to install for this emissions unit (P010) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Isopropanol

TLV (mg/m3): 983 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 5.8 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,005ug/m3

MAGLC (ug/m3): 23,406ug/m3

The permit to install for these emissions units (P026 and P028) were evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene

TLV (mg/m3): 188.4 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 4.0 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 455ug/m3

MAGLC (ug/m3): 4886ug/m3

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

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

[Authority for Term: OAC rule 3745-77-07(C)(1), PTI 08-04434 and PTI 08-04346]

(4) 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

[Authority for Term: OAC rule 3745-77-07(C)(1), PTI 08-04434 and PTI 08-04346]

(5) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

[Authority for Term: OAC rule 3745-77-07(C)(1), PTI 08-04434 and PTI 08-04346]

e) Reporting Requirements

(1) The permittee shall submit annual reports that specify the total actual annual OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15th of each year. This reporting requirement may be satisfied by including and identifying the specific emissions data from this emissions unit in the annual Fee Emissions Report.

[Authority for Term: OAC rule 3745-77-07(C)(1), PTI 08-04434 and PTI 08-04346]

(2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for Term: OAC rule 3745-77-07(C)(1), PTI 08-04434 and PTI 08-04346]

f) Testing Requirements

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

a. <u>Emissions Limitation</u>:

The emissions of OC from coatings from these emissions units shall not exceed the following:

P010 -1.67 lbs/hr

P026 and P028- 1.7 lbs/hr, individually

Applicable Compliance Method:

The hourly allowable OC emissions limitations were established by multiplying the maximum OC content of all the coatings (lbs OC/gallon) by the maximum coating application rate (gallons/hr).

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

[Authority for Term: OAC rule 3745-77-07(C)(1),PTI 08-04434 and PTI 08-04346]

b. Emissions Limitation:

The emissions of OCfrom coatings and cleanup materials from these emissions units shall not exceed the following:

P010 - 7.3 tons/yr

P026 and P028 – 4.3 tons/yr, individually

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(2).

[Authority for Term: OAC rule 3745-77-07(C)(1),PTI 08-04434 and PTI 08-04346]

(2) Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup.

[Authority for Term: OAC rule 3745-77-07(C)(1), PTI 08-04434 and PTI 08-04346]

g) Miscellaneous Requirements

(1) None.

4. Emissions Unit Group -coating misc. metals parts: P005, P023, P029,

EU ID	Operations, Property and/or Equipment Description
P005	LINE #3 EXTRUSION; COATING OF MISCELLANEOUS METAL PARTS WITH ADHESIVE
P023	LINE #4 EXTRUSION; COATING OF MISCELLANEOUS METAL PARTS WITH ADHESIVE
P029	LINE #2 EXTRUSION; COATING OF METAL WIRE WITH ADHESIVE

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

(1) None.

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) PTI 08-04346 issued 04/06/2006	<u>For emissions unit P005</u> The emissions of Volatile Organic Compound (VOC) from this emissions unit shall not exceed 1.59 lbs/hr and 38.22 lbs/day from coatings and 5.03 tons per year from coatings and cleanupmaterials. See b)(2)a. The permittee shall not use more than 6 gallons of coating material per day for the coating of miscellaneous metal parts. <u>For emissions unit P029</u> The emissions of VOC from this emissions unit shall not exceed 2.10 lbs/hr and 50.96 lbs/day from coatings and 6.94 tons per year from coatings and cleanupmaterials. See b)(2)a. The requirements established pursuant to this rule also include the requirements of

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		OAC rule 3745-21-09(U)(2)(e)(i).
b.	OAC rule 3745-31-05(A)(3) PTI 08-3427 issued 12/28/1995	<u>For emissions unit P023</u> The emissions of VOC from this emissions unit shall not exceed 0.741 lb/hr and 16.49 lbs/day from coatings and 3.2 tons per year from coatings and cleanupmaterials. See b)(2)a. The requirements established pursuant to this rule also include the requirements of OAC rule 3745-21-09(U)(2)(e)(i).
c.	OAC rule 3745-21-09(U)(2)(e)(i)	<u>For emissions unit P005</u> The requirements established pursuant to this rule is less stringent than the requirement established pursuant to OAC rule 3745-31-05(A)(3). <u>For emissions unit P023 and P029</u> The permittee shall not use more than 8 gallons of coating material per day for the coating of miscellaneous metal parts.
d.	Compliance with Ohio EPA's "Air Toxic Policy"	<u>For emissions unit P005 and P029</u> See d)(4) through d)(6).

(2) Additional Terms and Conditions

a. The hourly VOC emissions limits were established to reflect the potential to emit for these emissions units. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these short term emissions limitations.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

a. The name and identification number of each coating employed.

b. The VOC content of each coating employed, in pounds per gallon, as applied.

c. The number of gallons of each coating employed.

d. The total number of gallons of all the coatings employed.

e. The total VOC emissions from all the coatings employed, in pounds, i.e., the sum of d)(1)b. times d)(1)c. for each coating employed.

[Authority for Term: OAC rule 3745-77-07(C)(1), PTI 08-3427 and PTI 08-04346]

(2) The permittee shall collect and record the following information each monthfor these emissions units:

a. The company identification of each cleanup material employed.

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

c. The VOC content of each cleanup material employed, in pounds per gallon.

d. The total VOC emissions from all cleanup materials employed, in pounds, i.e., summation of d)(1)f. x d)(1)g. for each cleanup material employed.

[Authority for Term: OAC rule 3745-77-07(C)(1),PTI 08-3427 and PTI 08-04346]

(3) The permittee shall calculate and record the annualVOCemissions, i.e., the sum of the daily VOC emissions from the coating material, as recorded in d)(1)e., plus the monthly emissions from all cleanup materials applied, as recorded in d)(2)d.

[Authority for Term: OAC rule 3745-77-07(C)(1),PTI 08-3427 and PTI 08-04346]

(4) The permit to install for these emissions units (P005 and P029) were evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene

TLV (mg/m3): 188.4 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 4.0 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 455 ug/m3

MAGLC (ug/m3): 4,486 ug/m3

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

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04346]

(5) If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

[Authority for Term: OAC rule 3745-77-07(C)(1)] and PTI 08-04346]

(6) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

[Authority for Term: OAC rule 3745-77-07(C)(1)] and PTI 08-04346]

e) Reporting Requirements

(1) The permittee shall notify the Director (DO/LAA) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit. The notification shall include a copy of such record and shall be sent to the Director (DO/LAA) within 45 days after the exceedance occurs.

[Authority for Term: OAC rule 3745-77-07(C)(1)]

(2) The permittee shall submit quarterly deviation reports that identify each day the VOC emissions exceeded the daily emissions limit specified in b)(1)a. and b)(1)b.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1),PTI 08-3427 and PTI 08-04346]

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

[Authority for Term: OAC rule 3745-77-07(C)(1),PTI 08-3427 and PTI 08-04346]

(4) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for Term: OAC rule 3745-77-07(C)(1),PTI 08-3427 and PTI 08-04346]

f) Testing Requirements

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

a. <u>Emissions Limitation</u>:

The emissions of VOC from coatings from these emissions units shall not exceed the following:

P005 - 1.59 lbs/hr

P023 - 0.741 lb/hr

P029 - 2.10 lbs/hr

<u>Applicable Compliance Method</u>:

The hourly allowable VOC emissions limitations were established by multiplying the maximum OC content of all the coatings (lbs VOC/gallon) by the maximum coating application rate (gallons/hr).

If required, the hourly allowable VOC limitation shall be determined in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

[Authority for Term: OAC rule 3745-77-07(C)(1),PTI 08-3427 and PTI 08-04346]

b. Emissions Limitation:

The emissions of VOC from coatings from these emissions units shall not exceed the following:

P005 - 38.22 lbs/day

P023 - 50.96 lbs/day

P029 - 16.49 lbs/day

Applicable Compliance Method:

Compliance shall based upon the record keeping specified in d)(1)e.

[Authority for Term: OAC rule 3745-77-07(C)(1),PTI 08-3427 and PTI 08-04346]

c. Emissions Limitation:

The emissions of VOCfrom coatings and cleanup materialsfrom these emissions units shall not exceed the following:

P005 - 5.03 tons/yr

P023 - 6.94 tons/yr

P029 - 3.2 tons/yr

Applicable Compliance Method:

Compliance shall based upon the record keeping specified in d)(3).

[Authority for Term: OAC rule 3745-77-07(C)(1),PTI 08-3427 and PTI 08-04346]

(2) Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup.

[Authority for Term: OAC rule 3745-77-07(C)(1),PTI 08-3427 and PTI 08-04346]

g) Miscellaneous Requirements

(1) None.

5. Emissions Unit Group -injection molding: P034, P035, P036, P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048, P049.

EU ID	Operations, Property and/or Equipment Description
P034	INJECTION MOLDING OF PLASTIC SIDE MOLDING
P035	INJECTION MOLDING OF PLASTIC SIDE MOLDING
P036	INJECTION MOLDING OF PLASTIC SIDE MOLDING
P038	INJECTION MOLDING OF PLASTIC SIDE MOLDING
P039	INJECTION MOLDING OF PLASTIC SIDE MOLDING
P040	INJECTION MOLDING OF PLASTIC SIDE MOLDING
P041	INJECTION MOLDING OF PLASTIC SIDE MOLDING
P042	INJECTION MOLDING OF PLASTIC SIDE MOLDING
P043	INJECTION MOLDING OF PLASTIC SIDE MOLDING
P044	INJECTION MOLDING OF PLASTIC SIDE MOLDING
P045	INJECTION MOLDING OF PLASTIC SIDE MOLDING
P046	INJECTION MOLDING OF PLASTIC SIDE MOLDING
P047	INJECTION MOLDING OF PLASTIC SIDE MOLDING
P048	INJECTION MOLDING OF PLASTIC SIDE MOLDING
P049	INJECTION MOLDING OF PLASTIC SIDE MOLDING

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

(1) None.

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) PTI 08-04672 issued 06/16/2005	<u>For emissions unit P034, P035, P036, P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048 and P049</u> The emissions of Organic compound (OC) from each of these emissions units shall not exceed 1.66 lbs/hr from coatings. See b)(2)a. The requirements established pursuant to this rule also include the requirement of OAC rule 3745-31-05(D).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Major New Source Review) PTI 08-04672 issued 06/16/2005	The emissions of OC from each of these emissions unitsshall not exceed 2.0 tons/yr, based upon a rolling, 12-month summation of the monthly emissions.
c.	Compliance with Ohio EPA's "Air Toxic Policy"	See d)(3) through d)(6).

(2) Additional Terms and Conditions

a. The hourly OC emissions limits were established to reflect the potential to emit for these emissions units. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these short term emissions limitations.

b. The requirements of OAC rule 3745-21-07(M) are not applicable because there is no control device for this emissions unit.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for these emissions units:

a. The name and identification number of each coating employed.

b. The OC content of each coating employed, in pounds per gallon, as applied.

c. The number of gallons of each coating employed.

d. The total OC emissions from all the coatings employed, in pounds, i.e., the sum of d)(1)b. times d)(1)c. for each coating employed.

e. The company identification of each cleanup material employed.

f. The number of gallons of each cleanup material employed.

g. The OC content of each cleanup material employed, in pounds per gallon.

h. The total OC emissions from all cleanup materials employed, in pounds, i.e., summation of d)(1)f. x d)(1)g. for each cleanup material employed.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

(2) The permittee shall calculate and maintain monthly records of the OCemissions and the rolling 12-monthemissions of OC.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

(3) The permit to install for these emissions unit (P034-P036, P038, P039, P041-P049) were evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application for all the injection mold groups combined. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (mg/m3): 188.4 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 4.86 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,856ug/m3

MAGLC (ug/m3): 4,486ug/m3

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

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

(4) 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

(5) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following all exceedances of the rolling, 12-monthemissions limitation for OC.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

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

(3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

f) Testing Requirements

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

a. Emissions Limitation:

The emissions of OC from each of these emissions unitsshall not exceed 1.66 lbs/hr from coatings.

Applicable Compliance Method:

The hourly allowable OC emissions limitations were established by multiplying the maximum OC content of all the coatings (lbs OC/gallon) by the maximum coating application rate (gallons/hr).

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

b. Emissions Limitation:

The emissions of OC from each of these emissions unitsshall not exceed2.0 tons/yr, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(2).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

(2) Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04672]

g) Miscellaneous Requirements

(1) None.

6. Emissions Unit Group -silicone spray station: P051, P052,

EU ID	Operations, Property and/or Equipment Description
P051	SILICONE COATING OF EXTRUDED RUBBER
P052	SILICONE COATING OF EXTRUDED RUBBER

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

(1) None.

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) PTI 08-04279 issued 05/15/2001	<u>For emissions unit P051 and P052</u>: The emissions of Organic Compound (OC) from each of these emissions unitsshall not exceed 1.66 lbs/hr from coatings and 7.3 tons/year from coatings and cleanupmaterials. See b)(2)a.
b.	Compliance with Ohio EPA's "Air Toxic Policy"	See d)(3) through d)(6).

(2) Additional Terms and Conditions

a. The hourly OC emissions limits were established to reflect the potential to emit for these emissions units. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these short term emissions limitations.

b. The requirements of OAC rule 3745-21-07(M) are not applicable because there is no control device for this emissions unit.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for these emissions units:

a. The name and identification number of each coating employed.

b. The OC content of each coating employed, in pounds per gallon, as applied.

c. The number of gallons of each coating employed.

d. The total OC emissions from all the coatings employed, in pounds, i.e., the sum of d)(1)b. times d)(1)c. for each coating employed.

e. The company identification of each cleanup material employed.

f. The number of gallons of each cleanup material employed.

g. The OC content of each cleanup material employed, in pounds per gallon.

h. The total OC emissions from all cleanup materials employed, in pounds, i.e., summation of d)(1)f. x d)(1)g. for each cleanup material employed.

[Authority for Term: OAC rule 3745-77-07(C)(1)] and PTI 08-04279]

(2) The permittee shall calculate and record the annualOCemissions, i.e., the sum of the monthly OC emissions from the coating material, as recorded in d)(1)d., plus the monthly emissions from all cleanup materials applied, as recorded in d)(1)h.

Authority for Term: OAC rule 3745-77-07(C)(1)] and PTI 08-04279]

(3) The permit to install for these emissions units (P051 and P052) were evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene

TLV (mg/m3): 572.59 mg/m3

Maximum Hourly Emission Rate (lbs/hr): 1.66 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4,486 ug/m3

MAGLC (ug/m3): 13,633.26 ug/m3

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

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

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04279]

(4) 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

[Authority for Term: OAC rule 3745-77-07(C)(1)] and PTI 08-04279]

(5) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

[Authority for Term: OAC rule 3745-77-07(C)(1)] and PTI 08-04279]

e) Reporting Requirements

(1) The permittee shall submit annual reports that specify the total actual annual OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15th of each year. This reporting requirement may be satisfied by including and identifying the specific emissions data from this emissions unit in the annual Fee Emissions Report.

[Authority for Term: OAC rule 3745-77-07(C)(1)] and PTI 08-04279]

(2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04279]

f) Testing Requirements

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

a. Emissions Limitation:

The emissions of OCfrom each of these emissions unitsshall not exceed 1.66 lbs/hr from coatings.

Applicable Compliance Method:

The hourly allowable OC emissions limitations were established by multiplying the maximum OC content of all the coatings (lbs OC/gallon) by the maximum coating application rate (gallons/hr).

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

[Authority for Term: OAC rule 3745-77-07(C)(1)] and PTI 08-04279]]

b. Emissions Limitation:

The emissions of OCeach of these emissions unitsshall not exceed 7.3 tons/yr from coatings and cleanup materials.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(2).

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04279]

(2) Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup.

[Authority for Term: OAC rule 3745-77-07(C)(1) and PTI 08-04279].

g) Miscellaneous Requirements

(1) None.

7. Emissions Unit Group -silicone weather seal line: P003, P012,

EU ID	Operations, Property and/or Equipment Description
P003	RUBBER WEATHERSEAL LINE 1 SILICONE
P012	RUBBER WEATHERSEAL LINE 2 SILICONE

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

(1) None.

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) PTI 08-1427 issued 02/10/1988	<u>For emissions unit P003</u> The emissions of Organic Compound (OC) from this emissions unit shall not exceed 2.21 lbs/hrand 4.43 tons/year from coatings. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3) PTI 08-1869 issued 10/04/1989	<u>For emissions unit P012</u> The emissions of OC from this emissions unit shall not exceed 1.5 lbs/hrand 4.6 tons/year from coatings. See b)(2)a.

(2) Additional Terms and Conditions

a. The hourly OC emissions limits were established to reflect the potential to emit for these emissions units. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these short term emissions limitations.

b. The requirements of OAC rule 3745-21-07(M) are not applicable because there is no control device for this emissions unit.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for these emissions units:

a. The name and identification number of each coating employed.

b. The OC content of each coating employed, in pounds per gallon, as applied.

c. The number of gallons of each coating employed.

d. The total OC emissions from all the coatings employed, in pounds, i.e., the sum of d)(1)b. times d)(1)c. for each coating employed.

[Authority for Term: OAC rule 3745-77-07(C)(1), PTI 08-1427 and PTI 08-1869]

(2) The permittee shall calculate and record the annualOCemissions, i.e., the sum of the monthly OC emissions from the coating material, as recorded in d)(1)d.

[Authority for Term: OAC rule 3745-77-07(C)(1), PTI 08-1427 and PTI 08-1869]

e) Reporting Requirements

(1) The permittee shall submit annual reports that specify the total actual annual OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15th of each year. This reporting requirement may be satisfied by including and identifying the specific emissions data from this emissions unit in the annual Fee Emissions Report.

[Authority for Term: OAC rule 3745-77-07(C)(1), PTI 08-1427 and PTI 08-1869]

(2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for Term: OAC rule 3745-77-07(C)(1), PTI 08-1427 and PTI 08-1869]

f) Testing Requirements

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

a. <u>Emissions Limitation</u>:

The emissions of OC from these emissions units shall not exceedthe following:

P003 - 2.21 lbs/hr

P012 - 1.5 lbs/hr

Applicable Compliance Method:

The hourly allowable OC emissions limitations were established by multiplying the maximum OC content of all the coatings (lbs OC/gallon) by the maximum coating application rate (gallons/hr).

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

[Authority for Term: OAC rule 3745-77-07(C)(1), PTI 08-1427 and PTI 08-1869]]

b. Emissions Limitation:

The emissions of OC from these emissions units shall not exceedthe following:

P003 - 4.43 tons/yr

P012 - 4.6 tons/yr

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(2).

[Authority for Term: OAC rule 3745-77-07(C)(1), PTI 08-1427 and PTI 08-1869]

(2) Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup.

[Authority for Term: OAC rule 3745-77-07(C)(1), PTI 08-1427 and PTI 08-1869]

g) Miscellaneous Requirements

(1) None.