



Environmental
Protection Agency

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

10/21/2011

Jeanie Weiskittle
AGC AUTOMOTIVE AMERICAS
1465 W SANDUSKY AVE
BELLEFONTAINE, OH 43311

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0546000103
Permit Number: P0108512
Permit Type: Renewal
County: Logan

Certified Mail

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

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

If you have any questions, please contact Ohio EPA DAPC, Southwest District Office at (937)285-6357 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPCWeb page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: Ohio EPA-SWDO



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
AGC AUTOMOTIVE AMERICAS**

Facility ID:	0546000103
Permit Number:	P0108512
Permit Type:	Renewal
Issued:	10/21/2011
Effective:	10/21/2011
Expiration:	3/15/2016



Division of Air Pollution Control
Permit-to-Install and Operate
for
AGC AUTOMOTIVE AMERICAS

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Authorization

Facility ID: 0546000103
Application Number(s): A0042318
Permit Number: P0108512
Permit Description: This permit is to renewal the PTIO's for the silver coating and encapsulation operations and adjust the ST&C's to the installation of R028
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 10/21/2011
Effective Date: 10/21/2011
Expiration Date: 3/15/2016
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

AGC AUTOMOTIVE AMERICAS
1465 W SANDUSKY AVE
BELLEFONTAINE, OH 43311

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

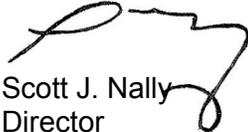
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Southwest District Office
401 East Fifth Street
Dayton, OH 45402
(937)285-6357

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Scott J. Nally
Director



Authorization (continued)

Permit Number: P0108512

Permit Description: This permit is to renew the PTIO's for the silver coating and encapsulation operations and adjust the ST&C's to the installation of R028

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

Group Name: 0.67 lb OC /hr encapsulation

Emissions Unit ID:	R013
Company Equipment ID:	BE-2 PVC Encapsulation
Superseded Permit Number:	P0088808
General Permit Category andType:	Not Applicable
Emissions Unit ID:	R014
Company Equipment ID:	BE-4 PVC Encapsulation
Superseded Permit Number:	P0088808
General Permit Category andType:	Not Applicable

Group Name: 0.69 lbs OC/hr Silver lines

Emissions Unit ID:	R017
Company Equipment ID:	B83 Silver
Superseded Permit Number:	P0088808
General Permit Category andType:	Not Applicable
Emissions Unit ID:	R018
Company Equipment ID:	B84 Silver
Superseded Permit Number:	P0088808
General Permit Category andType:	Not Applicable
Emissions Unit ID:	R019
Company Equipment ID:	BT3 Silver Table 1
Superseded Permit Number:	P0088808
General Permit Category andType:	Not Applicable
Emissions Unit ID:	R020
Company Equipment ID:	BT3 Silver Table 2
Superseded Permit Number:	P0088808
General Permit Category andType:	Not Applicable
Emissions Unit ID:	R021
Company Equipment ID:	BTP-05 Silver Table
Superseded Permit Number:	P0088808
General Permit Category andType:	Not Applicable
Emissions Unit ID:	R022
Company Equipment ID:	BT-01 Silver
Superseded Permit Number:	P0088808
General Permit Category andType:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Southwest District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

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

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

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

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

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

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

¹Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
 - (2) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) Sections B.2., 3. and 4.
- b) 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 not exceed 9.0 tons per year (TPY) for any individual HAP and 24 TPY for the combination of all HAPs, based upon rolling, 12-month summations.
- c) The permittee shall collect and record the following information each month for this facility:
 - (1) the company identification for each HAP-emitting material (i.e., all HAP-containing coatings, clean-up materials, resins, adhesives, potting compounds, plating chemicals, etc.);
 - (2) the individual HAP content of each HAP emitting material;
 - (3) the total combined HAP content of each HAP emitting material (i.e. sum of individual HAP contents from b);
 - (4) the amount of each HAP emitting material employed during the previous calendar month;
 - (5) the hours of operation, or other emissions determining rationale, of all HAP-generating sources (e.g., fuel combustion, sanding/grinding operations, plating);
 - (6) the total individual HAP emissions from all HAP-emitting materials employed and all HAP-generating sources, in pounds or tons per month;
 - (7) the total combined HAP emissions from all HAP emitting materials employed and all HAP-generating sources, in pounds or tons per month;
 - (8) the rolling, 12-month summation of individual HAP emissions from all HAP-emitting materials employed and all HAP-generating sources, in tons; and
 - (9) the rolling, 12-month summation of total combined HAP emissions from all HAP-emitting materials employed and all HAP-generating sources, in tons.
- d) The permittee shall submit quarterly deviation (excursion) reports for the following emissions unit(s) that identify:

- (1) all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - (a) The rolling 12 individual HAP emissions is greater than 9.0 tons from this facility; and
 - (b) The rolling 12 month combined HAP's emissions are greater than 24.0 tons from this facility.
- (2) the probable cause of each deviation (excursion);
- (3) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- (4) the magnitude and duration of each deviation (excursion).

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

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

[OAC rule 3745-15-03(B)(1)(b)] and [OAC rule 3745-15-03(C)]

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group -0.67 lb OC /hr silver lines: R013,R014,

EU ID	Operations, Property and/or Equipment Description
R013	BE-2 Encapsulation Line
R014	BE-04 PVC Encapsulation Line

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
- (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
- a. b)(1)c., d)(3), and e)(2), below..
- (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
- a. None.
- b) Applicable Emissions Limitations and/or Control Requirements
- (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The Organic Compound (OC) emissions from the coating materials employed in this emission unit shall not exceed shall not exceed 0.67 lbs. /hr.
b.	OAC rule 3745-31-05(D) (to avoid Title V)	<p>The combined overall organic compound (OC) emissions from the use of coating and adhesive materials employed in emissions units R013, R014, R024, R025, R026, and R027 shall not exceed 12.0 tons per rolling 12 month period.</p> <p>The combined overall OC emissions from the use of cleanup materials in emission units at this facility K009, R001, R004, R005, R007, R008, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, R025, R026, R027, and R028 shall not</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		exceed 13.00 tons per rolling 12 month period.
c.	OAC rule 3745-114-01	Ohio Toxic Rule

(2) Additional Terms and Conditions

- a. The hourly limitation of 0.67 pounds of OC/VOC per hour is established to reflect the potential emissions from this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limitation.

c) Operational Restrictions

- (1) The combined organic compounds emitted from the coatings and adhesives employed in emission units R013, R014, R024, R025, R026, and R027 shall not exceed 12.0 tons per year, based upon a rolling, 12-month summation of all coatings and adhesives employed in these emission units.

d) Monitoring and/or Recordkeeping Requirements

- (1) This facility shall maintain the following monthly records on all coatings and adhesives employed in emissions units R013, R014, R024, R025, R026, and R027:
 - a. the name of the coating or adhesive employed;
 - b. the amount of coating or adhesive employed, in gallons;
 - c. the organic compound content, in lbs/gallon;
 - d. the OC emission of all coatings or adhesive employed, in tons per month; and
 - e. the 12-month rolling total amount of OC emitted from the use of coatings or adhesives, in tons per last 12-month period.
- (2) The permittee shall collect and record the following information each month on the cleanup materials in emission units: K009, R001, R004, R005, R007, R008, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, R025, R026, R027, and R028:
 - a. the name of the material employed;
 - b. the amount of material employed, in gallons;
 - c. the organic compound content, in lbs. /gallon;
 - d. the OC emission of all cleanup materials, in tons per month; and

- e. the 12-month rolling total amount of OC emitted from the use of cleanup materials, in tons per last 12-month period.
- (3) The permit to install for this emissions unit was evaluated based on the actual 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 Maximum in-stack concentration was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results for the "worst case" pollutant(s):

Pollutant: TrimethpentanediolMonoisobutyrate
TLV (mg/m3): 188
Maximum Hourly Emission Rate (lbs/hr): 0.65
MAGLC (ug/m3): 4,476.2
Estimated In-Stack Concentration (ug/m3): 23,571.5
Screen 3 predicted Highest Ground Level Concentration (ug/m3): 8.34

- (4) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

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

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01]

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports which include the following information:
- a. an identification of each 12-month period during which the combined OC emissions from the coatings or adhesives employed in emissions units R013, R014, R024, R025, R026, and R027 exceeded 12.0 tons; and
 - b. an identification of each 12-month period during which the facility-wide combined OC emissions from the use of cleanup materials exceeded 13.00 tons;

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

(OAC rule 3745-15-03(B)(1)(a) and OAC rule 3745-15-03(C) and OAC rule 3745-77-07(C)(1))

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

0.67 pounds of OC per hour

The above hourly limitation is based on the following equation:

$$\text{HER} = \text{Cu} \times \text{OC}$$

Where:

HER= Hourly Emission Rate, in pounds per hour;

Cu = Coating usage, in gallons per hour, (0.1, combined hourly coating usage in EAC form that was submitted with permit application); and

OC = Organic Compound content, in pounds per gallon.

Applicable Compliance Method:

Compliance with the above emissions limitations will be assumed based on the maximum coating usage and OC/VOC content in the permit application. Prior to modifying the coating usage and/or OC/VOC content employed in this emissions unit that would cause an increase in the hourly potential OC emissions from this emissions unit, the permittee shall apply for and obtain all appropriate air pollution permits.

b. Emission Limitation:

Combined OC emissions from emissions units R013, R014, R024, R025, R026, and R027 of 12.0 tons per rolling 12 month period.

Applicable Compliance Method:

Compliance with the above emissions limitation shall be determined by the record keeping established in section d) of this permit.

c. Emission Limitation:

The combined overall OC emissions from the use of cleanup materials in emission units at this facility K009, R001, R004, R005, R007, R008, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, R025, R026, R027, and R028 shall not exceed 13.00 tons per rolling 12 month period.

Applicable Compliance Method:

Compliance with the above emissions limitation shall be determined by the record keeping established in section d) of this permit.

g) Miscellaneous Requirements

- (1) None.

2. Emissions Unit Group -0.69 lbs OC/hr Silver lines: R017,R018,R019,R020,R021,R022,

EU ID	Operations, Property and/or Equipment Description
R017	B-83 Silver line
R018	B-84 Silver line
R019	BT-3 Silver Table 1
R020	BT-3 Silver Table 2
R021	BTP-05 Silver Table
R022	BT-01 Silver line

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
- (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
- a. b)(1)c., d)(3), (4), and (5).
- (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
- a. None.
- b) Applicable Emissions Limitations and/or Control Requirements
- (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The Organic Compound (OC) emissions from the coating materials employed in this emission unit shall not exceed shall not exceed 0.69 lbs. /hr.
b.	OAC rule 3745-31-05(D) (to avoid Title V)	<p>The combined overall OC's employed from the use of coating materials in emissions units at this facility R017, R018, R019, R020, R021, and R022, shall not exceed 5.00 tons per rolling 12 month period.</p> <p>The combined overall OC emissions from the use of cleanup materials in emission units at this facility K009, R001, R004,</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		R005, R007, R008, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, R025, R026, R027, and R028 shall not exceed 13.00 tons per rolling 12 month period.
c.	OAC rule 3745-114-01 Ohio Toxic Rule	See sections d)(3), (4), and (5), below.

(2) Additional Terms and Conditions

a. The hourly limitation of 0.69 pounds of OC/VOC per hour is established to reflect the potential emissions from this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limitation.

c) Operational Restrictions

- (1) The combined organic compounds emitted from the coatings employed in emission units R017, R018, R019, R020, R021, and R022, shall not exceed 5.0 tons per year, based upon a rolling, 12-month summation of all coatings employed in these emission units.
- (2) The monthly volume weighted average OC content of the combined coating materials employed in emissions units R017, R018, R019, R020, R021, and R022, shall not exceed 8.65 lbs/gallon.
- (3) The OC content of the Liquid Organic Cleanup Materials employed in this emissions unit shall not exceed 7.25 lbs/gallon.
- (4) The permit to install for this emissions unit was evaluated based on the actual 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 Maximum in-stack concentration was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results for the "worst case" pollutant(s):

Pollutant: Toluene
 TLV (mg/m3): 375
 Maximum Hourly Emission Rate (lbs/hr): 1.48
 MAGLC (ug/m3): 8,928.57
 Estimated In-Stack Concentration (ug/m3): 53,894.3
 Screen 3 predicted Highest Ground Level Concentration (ug/m3): 19.08

(5) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not

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

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

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

- (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. 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.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01]

d) **Monitoring and/or Recordkeeping Requirements**

- (1) This facility shall maintain the following monthly records on all coatings employed in emission units R017, R018, R019, R020, R021, and R022:

- a. the name of the coating employed;
 - b. the amount of each coating employed, in gallons;
 - c. the organic compound content of each coating employed, in lbs/gallon;
 - d. the combined organic compound emissions from each coating employed, in lbs of OC emitted per month ("b" x "c"); the total OC emitted per rolling 12-month period from all coatings employed, in lbs per rolling 12-month period (the summation of "d" for all coatings employed);
 - e. the total amount of coatings employed, in gallons per month (the summation of "b" for all coatings employed); and
 - f. the volume weighted average OC content of the coatings employed, in lbs per gallon ("e" / "f").
- (2) The permittee shall collect and record the following information each month on the cleanup materials in emission units: K009, R001, R004, R005, R007, R008, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, R025, R026, R027, and R028:
- a. the name of the material employed;
 - b. the amount of material employed, in gallons;
 - c. the organic compound content, in lbs. /gallon;
 - d. the OC emission of all cleanup materials, in tons per month; and
 - e. the 12-month rolling total amount of OC emitted from the use of cleanup materials, in tons per last 12-month period.
- e) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
- a. Emission Limitation:
0.69 pounds of OC per hour

The above hourly limitation is based on the following equation:

 $HER = Cu \times OC$

Where:

HER= Hourly Emission Rate, in pounds per hour;

Cu = Coating usage, in gallons per hour, (0.08); and

OC = Organic Compound content, in pounds per gallon, (8.65).

Applicable Compliance Method:

Compliance with the above emissions limitations will be assumed based on the maximum coating usage and OC/VOC content in the permit application. Prior to modifying the coating usage and/or OC/VOC content employed in this emissions unit that would cause an increase in the hourly potential OC emissions from this emissions unit, the permittee shall apply for and obtain all appropriate air pollution permits.

b. Emission Limitation:

The combined overall OC's employed from the use of coating materials in emissions units at this facility R017, R018, R019, R020, R021, and R022, shall not exceed 5.00 tons per rolling 12 month period.

Applicable Compliance Method:

Compliance with the above emissions limitation shall be determined by the record keeping established in section d) of this permit.

c. Emission Limitation:

The combined overall OC emissions from the use of cleanup materials in emission units at this facility K009, R001, R004, R005, R007, R008, R010, R011, R012, R013, R014, R015, R016, R017, R018, R019, R020, R021, R022, R023, R024, R025, R026, R027, and R028 shall not exceed 13.00 tons per rolling 12 month period.

Applicable Compliance Method:

Compliance with the above emissions limitation shall be determined by the record keeping established in section d) of this permit.

f) Miscellaneous Requirements

(1) None.