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

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)

12/22/2011

Mr. ERIC TANNER
BELLETECH CORPORATION
P.O. BOX 790
700 W Lake Ave
BELLEFONTAINE, OH 43311

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

Facility ID: 0546010102
Permit Number: P0108430
Permit Type: OAC Chapter 3745-31 Modification
County: Logan

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO)for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Bellefontaine Examiner. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page,www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and

Ohio EPA DAPC, Southwest District Office
401 East Fifth Street
Dayton, OH 45402

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now.If you have any questions, please contact Ohio EPA DAPC, Southwest District Office at (937)285-6357.

Sincerely,

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

Cc: U.S. EPA Region 5*Via E-Mail Notification*
Ohio EPA-SWDO; Indiana

Permit Strategy Write-Up

1. Check all that apply:

   xSynthetic Minor Determination (In order to avoid Title V requirements)
   Netting Determination

2. Source Description:

   This facility includes a number of VOC emitting operations for supplying automobile parts for various automobile manufacturers. During a facility inspection on March 11, 2011, Mr. Terry Sanner, Ohio EPA SWDO DAPC, discovered that the coatings being employed in emissions units R001 and R005 had volatile organic compound (VOC) content of 6.9 pounds per gallon, which exceeded their existing VOC content limitation of 4.9 pounds per gallon. In his inspection follow-up/warning letter letter, Mr. Sanner requested Belletech apply for and obtain new air pollution permits to address the VOC content problem.

   In this Chapter 31 PTI, Belletech has requested a number of changes in a number of emissions units in order to minimize the potential emissions from the use of the higher VOC content coatings.

3. Facility Emissions and Attainment Status:

   Belletech is a synthetic minor facility with federally enforceable limitations on its VOC and HAP(s) emissions. The Facility emissions will be limited to the following:

Emissions unit ID	Pollutant	tons/ rolling 12 month period	Permit #
K007-K011(combined)	VOC	5.6	P0108430
R001 (coating)	VOC	5.2	P0108430
R001 (cleanup)	VOC	2.03	P0108430
R002	VOC	2.13	PTI 05-13889
R005	VOC	2.1	P0108430
R009-R012 (combined)	VOC	9.4	P0108430
	Total VOC	26.5	
Facility	Individual HAP	9.9	P0108430
Facility	Combined HAP's	24.9	P0108430

   This facility is located in Logan County which is attainment for all regulated pollutants.

4. Source Emissions:

   See above Table

5. Conclusion:

   Based on the requested restrictions for BAT and the record keeping and reporting requirements, this permit will need to be issued draft and then final.

The issuance of this permit will be the bases for establishing compliance and a follow-up inspection should be scheduled to verify compliance with the new BAT limits within two years of the final issuance of this permit.

6. Total Permit Allowable Emissions Summary (for informational purposes only):

Pollutant	Tons Per Year
VOC	22.3
PE (filterable)	0.01
SO2	0.003
NOx	0.44
CO	0.35
Individual HAP*	9.9
Combined HAP's*	24.9

* Facility-wide limitations.

PUBLIC NOTICE
12/22/2011 Issuance of Draft Air Pollution Permit-To-Install and Operate

BELLETECH CORPORATION
CO. RD. 11 AT TWP. RD 216,
BELLEFONTAINE, OH 43311
Logan County
FACILITY DESC.: Glass Product Manufacturing Made of Purchased Glass
PERMIT #: P0108430
PERMIT TYPE: OAC Chapter 3745-31 Modification
PERMIT DESC: Adjusting material usage and limitations to allow for the use of higher VOC content coatings while minimizing overall facility VOC and HAP(s) emissions.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: http://epa.ohio.gov/dapc/permitsonline.aspx by entering the permit # or: Craig Osborne, Ohio EPA DAPC, Southwest District Office, 401 East Fifth Street, Dayton, OH 45402. Ph: (937)285-6357

Ohio | Environmental Protection Agency

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
BELLETECH CORPORATION

Facility ID:	0546010102
Permit Number:	P0108430
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	12/22/2011
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
BELLETECH CORPORATION

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Authorization

Facility ID: 0546010102
Application Number(s): A0042286
Permit Number: P0108430
Permit Description: Adjusting material usage and limitations to allow for the use of higher VOC content coatings while minimizing overall facility VOC and HAP(s) emissions.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: $2,000.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 12/22/2011
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

BELLETECH CORPORATION
CO. RD. 11 AT TWP. RD 216
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: P0108430
Permit Description: Adjusting material usage and limitations to allow for the use of higher VOC content coatings while minimizing overall facility VOC and HAP(s) emissions.

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

Emissions Unit ID:	**K007**
Company Equipment ID:	Adhesive Dispensing Station
Superseded Permit Number:	05-13889
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K011**
Company Equipment ID:	Adhesive Dispensing Station
Superseded Permit Number:	05-13889
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R001**
Company Equipment ID:	Automatic Holder Station
Superseded Permit Number:	05-13889
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R005**
Company Equipment ID:	Prime Glass Station
Superseded Permit Number:	05-13889
General Permit Category and Type:	Not Applicable

Group Name: Primer Coating

Emissions Unit ID:	**R009**
Company Equipment ID:	Prime Glass Station
Superseded Permit Number:	05-13889
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**R010**
Company Equipment ID:	Prime Glass Station
Superseded Permit Number:	05-13889
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**R011**
Company Equipment ID:	Prime Glass Station
Superseded Permit Number:	05-13889
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**R012**
Company Equipment ID:	Prime Glass Station
Superseded Permit Number:	05-13889
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 submitting[1] a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

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

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

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) Sections B.2., 3. and 4.

2. 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 9.9 tons per year (TPY) for any individual HAP and 24.9 TPY for the combination of all HAPs, based upon rolling, 12-month summations.

3. The permittee shall collect and record the following information each month for this facility:

   a) the company identification for each HAP-emitting material (i.e., all HAP-containing coatings, clean-up materials, resins, adhesives, potting compounds, plating chemicals, etc.);

   b) the individual HAP content of each HAP emitting material;

   c) the total combined HAP content of each HAP emitting material (i.e. sum of individual HAP contents from b);

   d) the amount of each HAP emitting material employed during the previous calendar month;

   e) the hours of operation, or other emissions determining rationale, of all HAP-generating sources (e.g., fuel combustion, sanding/grinding operations, plating);

   f) the total individual HAP emissions from all HAP-emitting materials employed and all HAP-generating sources, in pounds or tons per month;

   g) the total combined HAP emissions from all HAP emitting materials employed and all HAP-generating sources, in pounds or tons per month;

   h) the rolling, 12-month summation of individual HAP emissions from all HAP-emitting materials employed and all HAP-generating sources, in tons; and

   i) the rolling, 12-month summation of total combined HAP emissions from all HAP-emitting materials employed and all HAP-generating sources, in tons.

4. The permittee shall submit quarterly deviation (excursion) reports for the following emissions unit(s) that identify:

   a) all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any

regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

(1) The rolling 12 individual HAP emissions is greater than 9.9 tons from this facility; and

(2) The rolling 12 month combined HAP's emissions are greater than 24.9 tons from this facility.

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

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

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

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

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

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

C. Emissions Unit Terms and Conditions

1. K007, Adhesive Dispensing Station

Operations, Property and/or Equipment Description:

Adhesive dispensing station no. 1

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)f., d)(3) and e)(3), 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 paragraph 3745-31-05(A)(3), as effective 11/30/01	Volatile organic compound (VOC) emissions shall not exceed 0.9 pounds per hour, excluding cleanup materials Emissions from natural gas combustion in the drying oven (1 mmBtu/hr): 0.002 lb PE(filterable)/hr 0.0006 lb SO2/hr 0.10 lbsNOx/hr 0.08 lbs CO/hr and 0.005 lb VOC/hr
b.	OAC paragraph 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See section b)(2)c., below.
c.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V)	The combined VOC emissions from “adhesive”* employed in emissions units K007 and K011 shall not exceed 5.6 tons per rolling 12 month period.

d.	OAC rule 3745-17-10 (from the combustion of natural gas)	Particulate emissions (PE) shall not exceed 0.020 pounds per million BTU of actual heat input.
e.	OAC rule 3745-17-07(A)(1)	Visible PE emissions from any baghouse vent that this emission unit is controlled by shall not exceed 20% opacity, as a 6-minute average.
f.	OAC rule 3745-114-01 (Ohio Toxic Rule)	See section d)(3) and e)(3), below.

* "Adhesive" material includes both the general adhesive plus the catalyst.

(2) Additional Terms and Conditions

a. The VOC emission limit of 0.9 lbs per hour, and the hourly emission limits from natural gas combustion are established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.

[OAC rule 3745-31-05(A)(3) as effective on 11/30/01]

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

[OAC rule 3745-31-05(A)(3) as effective on 11/30/01]

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

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions (PE), sulfur dioxide (SO2), nitrogen oxides (NOx), carbon monoxide (CO) and volatile organic compound (VOC) from this emissions unit since the "controlled" potential to emit is less than ten tons per year, for each.

[OAC paragraph 3745-31-05(A)(3)(a)(ii), as effective 12/01/06]

c) Operational Restrictions

(1) The volatile organic compound (VOC) content of the adhesive (adhesive plus catalyst) materials employed in this emissions unit shall not exceed 0.3 pounds of VOC per gallon of, as employed.

[OAC rule 3745-31-05(A)(3) as effective on 11/30/01]

(2) The combined adhesive materials usage in emissions units K007 and K011 shall not exceed 37,000 gallons as applied, (adhesive plus catalyst) per rolling 12 month period.

To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the combined adhesive materials usage in emissions units K007 and K011 input levels specified in the following table:

Month(s)	Cumulative “adhesive” usage (gallons)
1	3,700
1-2	7,400
1-3	11,100
1-4	14,800
1-5	18,500
1-6	22,200
1-7	25,900
1-8	29,600
1-9	33,300
1-10	37,000
1-11	37,000
1-12	37,000

After the first 12 calendar months following the issuance of this permit, compliance with the annual combined adhesive materials usage based upon a rolling, 12-month period.

[OAC rule 3745-31-05(D)

(3) The fuel employed in the drying oven shall be only natural gas.

[OAC rule 3745-31-05(A)(3) as effective on 11/30/01]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain the following monthly records on the combined "adhesive" materials employed in emissions unit K007 and K011:

a. The identification of all "adhesive" materials employed;

b. the amount of "adhesive" material employed, in gallons;

c. the VOC content of the "adhesive" material, in pounds per gallon; and

d. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the amount of "adhesive" material employed, in gallons.

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative amount of "adhesive" material employed for each calendar month.

[OAC rule 3745-31-05(D)]

(2) The permittee shall maintain daily records during which fuel other than natural gas was employed in the drying oven associated with this emissions unit. The records shall list the type and quantity of fuel employed.

[OAC rule 3745 31-05(A)(3) as effective on 11/30/01]

Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified FEPTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO. [ORC 3704.03(F)(3)(c) and F(4)]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. all exceedances of the rolling, 12-month "adhesive" material employed rate limitation; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative amount of "adhesive" material employed levels; and

b. allexceedances of the volatile organic compound (VOC) content of the adhesive (adhesive plus catalyst) materials employed in this emissions unit exceed 0.3 pounds of VOC per gallon of, as employed.

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)]

(2) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[OAC rule 3745 31-05(A)(3) as effective on 11/30/01]

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

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

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:

0.9 pounds of VOC per hour.

The above limitation is based on the following equation:

HER= Au x Avoc

Where:

HER = Hourly emission rate, in pounds per hour;

Au = Adhesive maximum usage rate, in gallons per hour, (3.0); and

Avoc = Adhesive VOC content, in pounds per gallon, (0.3)

Applicable Compliance Method:

Compliance shall be assumed based on the maximum adhesive usage rate does not exceed 3.0 gallons and the maximum VOC content of the adhesives does not exceed 0.3 pounds per gallon. Prior to any modification to the operation of this emissions unit that would cause an increase in the hourly VOC emissions rate; the permittee shall apply for and obtain all appropriate air pollution permits.

b. Emission Limitation:

5.6 tons of per rolling 12 month period, combined from emissions units K007 and K011.

The above limitation is based on the following equation:

AER= (Au x Avoc)/2000

Where:

AER = Annual emission rate, in tons per rolling 12 month period;

Au = Adhesive maximum usage rate, in gallons per rolling 12 month period, (37,000); and

Avoc = Adhesive VOC content, in pounds per gallon, (0.3)

Applicable Compliance Method:

Compliance shall be assumed based on the recordkeeping requirement established in section d) of this permit.

c. Emission Limitation:

Particulate emissions (PE) shall not exceed 0.020 pounds per million BTU of actual heat input.

Applicable Compliance Method:

Compliance shall be assumed based on the use of natural gas and the recordkeeping requirements established in section d) of this permit.

d. Emission Limitation:

Visible PE emissions from that this emission unit is controlled by shall not exceed 20% opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance with the visible emission limitation above shall be determined in accordance with methods specified in OAC rule 3745-17-03(B)(1).

e. Emission Limitation:

Emissions from natural gas combustion in the drying oven (1 mmBtu/hr):

0.002 lbPE(filterable)/hr

0.0006 lb SO2/hr

0.10 lbsNOx/hr

0.08 lbs CO/hr and

0.006 lb VOC/hr.

The above limitation is based on the following equation:

HER= [mmBtu/ (1020 Btu/scf)] x Ef

Where:

HER = Hourly emission rate, in pounds per hour;

mmBtu = BTU input rate, in millions BTU's per hour, (1); and

Ef = Emissions factor, in pounds per mm standard cubic feet of natural gas burned, (100 pounds of NOx, 84 pounds of CO, 1.7 Particulate matter (filterable), 0.6 pounds of SO2, and 5.5 pounds of VOC).

Applicable Compliance Method:

Compliance shall be assumed based on the use of natural gas and the recordkeeping requirements established in section d) of this permit. Prior to any modification to the operation of the drying oven that would cause an increase in the hourly emissions rates; the permittee shall apply for and obtain all appropriate air pollution permits.

g) Miscellaneous Requirements

(1) None.

2. K011, Adhesive Dispensing Station

Operations, Property and/or Equipment Description:

Adhesive dispensing

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)d., d)(2) 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 paragraph 3745-31-05(A)(3), as effective 11/30/01	Volatile organic compound (VOC) emissions shall not exceed 2.1 pounds per hour, excluding cleanup materials.
b.	OAC paragraph 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See section b)(2)c., below.
c.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V)	The combined VOC emissions from “adhesive”* employed in emissions units K007 and K011 shall not exceed 5.6 tons per rolling 12 month period.
d.	OAC rule 3745-114-01 (Ohio Toxic Rule)	See section d)(2) and e)(2), below.

* “Adhesive” material includes both the general adhesive plus the catalyst.

(2) Additional Terms and Conditions

a. The VOC emission limit of 2.1 lbs per hour, are established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.

[OAC rule 3745-31-05(A)(3) as effective on 11/30/01]

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

[OAC rule 3745-31-05(A)(3) as effective on 11/30/01]

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

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the volatile organic compound (VOC) from this emissions unit since the "controlled" potential to emit is less than ten tons per year, for each.

[OAC paragraph 3745-31-05(A)(3)(a)(ii), as effective 12/01/06]

c) Operational Restrictions

(1) The volatile organic compound (VOC) content of the adhesive (adhesive plus catalyst) materials employed in this emissions unit shall not exceed 0.3 pounds of VOC per gallon of, as employed.

[OAC rule 3745-31-05(A)(3) as effective on 11/30/01]

(2) The combined adhesive materials usage in emissions units K007 and K011 shall not exceed 37,000 gallons as applied, (adhesive plus catalyst) per rolling 12 month period.

To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the combined adhesive materials usage in emissions units K007 and K011 input levels specified in the following table:

Month(s)	Cumulative "adhesive" usage (gallons)
1	3,700
1-2	7,400
1-3	11,100
1-4	14,800

1-5	18,500
1-6	22,200
1-7	25,900
1-8	29,600
1-9	33,300
1-10	37,000
1-11	37,000
1-12	37,000

After the first 12 calendar months following the issuance of this permit, compliance with the annual combined adhesive materials usage based upon a rolling, 12-month period.

[OAC rule 3745-31-05(D)

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain the following monthly records on the combined “adhesive” materials employed in emissions unit K007 and K011:

a. The identification of all “adhesive” materials employed;

b. the amount of “adhesive” material employed, in gallons;

c. the VOC content of the “adhesive” material, in pounds per gallon; and

d. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the amount of “adhesive” material employed, in gallons.

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative amount of “adhesive” material employed for each calendar month.

[OAC rule 3745-31-05(D)]

(2) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit’s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified FEPTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the

materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.

[ORC 3704.03(F)(3)(c) and F(4)]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. all exceedances of the rolling, 12-month “adhesive” material employed rate limitation; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative amount of “adhesive” material employed levels; and

b. allexceedances of the volatile organic compound (VOC) content of the adhesive (adhesive plus catalyst) materials employed in this emissions unit exceed 0.3 pounds of VOC per gallon of, as employed.

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)]

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

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

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:

2.1 pounds of VOC per hour.

The above limitation is based on the following equation:

HER= Au x Avoc

Where:

HER = Hourly emission rate, in pounds per hour;

Au = Adhesive maximum usage rate, in gallons per hour, (7.0); and

Avoc = Adhesive VOC content, in pounds per gallon, (0.3)

Applicable Compliance Method:

Compliance shall be assumed based on the maximum adhesive usage rate does not exceed 7.0 gallons and the maximum VOC content of the adhesives does not exceed 0.3 pounds per gallon. Prior to any modification to the operation of this emissions unit that would cause an increase in the hourly VOC emissions rate; the permittee shall apply for and obtain all appropriate air pollution permits.

b. Emission Limitation:

5.6 tons of per rolling 12 month period, combined from emissions units K007 and K011.

The above limitation is based on the following equation:

AER= (Au x Avoc)/2000

Where:

AER = Annual emission rate, in tons per rolling 12 month period;

Au = Adhesive maximum usage rate, in gallons per rolling 12 month period, (37,000); and

Avoc = Adhesive VOC content, in pounds per gallon, (0.3)

Applicable Compliance Method:

Compliance shall be assumed based on the recordkeeping requirement established in section d) of this permit.

g) Miscellaneous Requirements

(1) None.

3. R001, Automatic Holder Station

Operations, Property and/or Equipment Description:

Automatic Holder Station

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

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

a. b)(1)e., 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 paragraph 3745-31-05(A)(3), as effective 11/30/01	Volatile organic compound (VOC) emissions shall not exceed 4.8 pounds per hour, excluding cleanup materials
b.	OAC paragraph 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See section b)(2)c., below.
c.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V)	The VOC emissions from the coatings employed in this emissions unit shall not exceed 5.2 tons per rolling 12 month period. The VOC emissions from the liquid organic cleanup materials employed in this emissions unit shall not exceed 2.03 tons per rolling 12 month period.

d.	OAC rule 3745-17-11(A)(1)(j)	Exempt from requirements of OAC rule 3745-17-11(C). See section b)(2)d., below.
e.	OAC rule 3745-114-01 (Ohio Toxics Rule)	See sections d)(3), and e)(2), below.

(2) Additional Terms and Conditions

a. The VOC emission limit of 2.1 lbs per hour is established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.

[OAC rule 3745-31-05(A)(3) as effective on 11/30/01]

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

[OAC rule 3745-31-05(A)(3) as effective on 11/30/01]

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

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to volatile organic compound (VOC) from this emissions unit since the "controlled" potential to emit is less than ten tons per year, for each.

[OAC paragraph 3745-31-05(A)(3)(a)(ii), as effective 12/01/06]

a. OAC rule 3745-17-11 rule applies to any operation, process, or activity which releases or may release particulate emissions into the ambient air except surface coating processes (e.g., for sealers, adhesives, and deadeners) that employ airless spray and bead-type (extrusion) application methods.

[OAC paragraph 3745-17-11(A)(1)(j)]

c) Operational Restrictions

(1) The VOC content of the coatings employed in this emissions unit shall not exceed 6.4 pounds per gallon, as applied.

[OAC rule 3745-31-05(A)(3) as effective on 11/30/01]

(2) The coating usage in this emissions unit shall not exceed 1,620 gallons per rolling 12 month period.

[OAC rule 3745-31-05(D)]

(3) The VOC content of the liquid organic cleanup materials employed in this emissions unit shall not exceed 7.52 pounds per gallon.

[OAC rule 3745-31-05(A)(3) as effective on 11/30/01]

(4) The liquid organic cleanup material usage in this emissions unit shall not exceed 540 gallons per rolling 12 month period.

[OAC rule 3745-31-05(D)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain the following monthly records on the coatings employed in this emissions unit:

a. the identification of all coating and/or thinners employed;

b. the amount of coatings employed, in gallons, as applied;

c. the VOC content of the coating material, in pounds per gallon, as applied; and

d. the rolling, 12-month summation of the amount of coating employed, in gallons, as applied.

[OAC rule 3745-31-05(D)]

(2) The permittee shall maintain the following monthly records on the liquid organic cleanup materials employed in this emissions unit:

a. the identification of liquid organic cleanup material employed;

b. the amount of liquid organic cleanup material employed, in gallons;

c. the VOC content of the liquid organic cleanup material, in pounds per gallon; and

d. the rolling, 12-month summation of the amount of liquid organic cleanup material employed, in gallons.

[OAC rule 3745-31-05(D)]

(3) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified FEPTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials or use of new materials that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.

[ORC 3704.03(F)(3)(c) and F(4)]

e) Reporting Requirements

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

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

i. The VOC content of the coatings employed in this emissions unit exceed 6.4 pounds per gallon, as applied;

ii. The coating usage in this emissions unit exceed 1,620 gallons per rolling 12 month period;

iii. The VOC content of the liquid organic cleanup materials employed in this emissions unit exceed 7.52 pounds per gallon; and

iv. The liquid organic cleanup material usage in this emissions unit exceeds 540 gallons per rolling 12 month period.

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

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

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

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

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

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

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

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

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:

4.8 pounds of VOC per hour.

The above limitation is based on the following equation:

HER= Cu x Cvoc

Where:

HER = Hourly emission rate, in pounds per hour;

Cu = Coating usage rate, in gallons per hour, (0.75); and

Cvoc = Coating VOC content, in pounds per gallon, as applied, (6.4).

Applicable Compliance Method:

Compliance shall be assumed based on the maximum coating usage rate does not exceed 0.75 gallons and the maximum VOC content of the coating does not exceed 6.4 pounds per gallon, as applied. Prior to any modification to the operation of this emissions unit that would cause an increase in the hourly VOC emissions rate; the permittee shall apply for and obtain all appropriate air pollution permits.

b. Emission Limitation:

5.2 tons of VOC per rolling 12 month period, from the coatings employed in emissions unit R001.

The above limitation is based on the following equation:

AER= (Cu x Cvoc)/2000

Where:

AER = Annual emission rate, in tons per rolling 12 month period;

Cu = Coating usage rate, in gallons per rolling 12 month period, (1,620); and

Cvoc = Coating VOC content, in pounds per gallon, as applied, (6.4).

Applicable Compliance Method:

Compliance shall be assumed based on the recordkeeping requirement established in section d) of this permit.

c. Emission Limitation:

2.03 tons of VOC per rolling 12 month period, from the liquid organic cleanup material employed in this emissions unit.

The above limitation is based on the following equation:

AER= (Clu x Clvoc)/2000

Where:

AER = Annual emission rate, in tons per rolling 12 month period;

Clu = liquid organic cleanup material maximum usage rate, in gallons per rolling 12 month period, (540); and

Clvoc = liquid organic cleanup material VOC content, in pounds per gallon, (7.52)

Applicable Compliance Method:

Compliance shall be assumed based on the recordkeeping requirement established in section d) of this permit.

g) Miscellaneous Requirements

(1) None.

4. R005, Prime Glass Station

Operations, Property and/or Equipment Description:

Brush coating holder primer operation

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)e., 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 paragraph 3745-31-05(A)(3), as effective 11/30/01	Volatile organic compound (VOC) emissions shall not exceed 1.3 pounds per hour, excluding cleanup materials.
b.	OAC paragraph 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See section b)(2)c., below.
c.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V)	The VOC emissions from the coatings employed in this emissions unit shall not exceed 2.1 tons per rolling 12 month period.
d.	OAC rule 3745-21-09(U)(2)(e)(iii)	Coating usage limitation.
e.	OAC rule 3745-114-01 (Ohio Toxics Rule)	See sections d)(3) and e)(2), below.

(2) Additional Terms and Conditions

a. The VOC emission limit of 1.3 lbs per hour is established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.

[OAC rule 3745-31-05(A)(3) as effective on 11/30/01]

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

[OAC rule 3745-31-05(A)(3) as effective on 11/30/01]

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

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the volatile organic compound (VOC) from this emissions unit since the "controlled" potential to emit is less than ten tons per year, for each.

[OAC paragraph 3745-31-05(A)(3)(a)(ii), as effective 12/01/06]

c) Operational Restrictions

(1) The coating usage in this emissions unit shall not exceed 650 gallons per rolling 12 month period.

[OAC paragraph 3745-31-05(D)]

(2) The coating usage in this emissions unit shall not exceed 10 gallons per day.

[OAC paragraph 3745-21-09(U)(2)(e)(iii)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain the following monthly records:

a. the identification of all coating and/or thinners employed;

b. the amount of coatings employed, in gallons, as applied; and

c. the rolling, 12-month summation of the amount of coating employed, in gallons, as applied.

[OAC rule 3745-31-05(D)]

(2) The permittee shall maintain the following daily records:

a. the amount of coatings employed, in gallons, as applied.

[OAC paragraph 3745-21-09(U)(2)(e)(iii)]

(3) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified FEPTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials or use of new materials that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.

[ORC 3704.03(F)(3)(c) and F(4)]

e) Reporting Requirements

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

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

i. the coating usage in this emissions unit exceed 650 gallons per rolling 12 month period; and

ii. the coating usage in this emissions unit exceed 10 gallons per day.

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

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

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

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

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to

March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

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

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

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

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:

1.3 pounds of VOC per hour.

The above limitation is based on the following equation:

HER= Cu x Cvoc

Where:

HER = Hourly emission rate, in pounds per hour;

Cu = Coating usage rate, in gallons per hour, (0.2); and

Cvoc = Coating VOC content, in pounds per gallon, as applied, (6.4).

Applicable Compliance Method:

Compliance shall be assumed based on the maximum coating usage rate does not exceed 0.2 gallons and the maximum VOC content of the coating does not exceed 6.4 pounds per gallon, as applied. Prior to any modification to the operation of this emissions unit that would cause an increase in the hourly VOC emissions rate; the permittee shall apply for and obtain all appropriate air pollution permits.

b. Emission Limitation:

2.1 tons of VOC per rolling 12 month period, from the coatings employed in emissions unit R001.

The above limitation is based on the following equation:

AER= (Cu x Cvoc)/2000

Where:

AER = Annual emission rate, in tons per rolling 12 month period;

Cu = Coating usage rate, in gallons per rolling 12 month period, (650); and

Cvoc = Coating VOC content, in pounds per gallon, as applied, (6.4).

Applicable Compliance Method:

Compliance shall be assumed based on the recordkeeping requirement established in section d) of this permit.

g) Miscellaneous Requirements

(1) None.

5. Emissions Unit Group -Primer Coating: R009,R010,R011,R012,

EU ID	Operations, Property and/or Equipment Description
R009	Brush Coating Prime glass station no. 1
R010	Brush Coating Prime glass station no. 2
R011	Brush Coating Prime glass station no. 3
R012	Brush Coating Prime glass station no. 4

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)d., d)(2), 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 paragraph 3745-31-05(A)(3), as effective 11/30/01	Volatile organic compound (VOC) emissions shall not exceed 7.0 pounds per hour, excluding cleanup materials.
b.	OAC paragraph 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See section b)(2)c., below.
c.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V)	The combined VOC emissions from emissions units R009 to R012 shall not exceed 9.4 tons per rolling 12 month period.
d.	OAC rule 3745-114-01 (Ohio Toxics Rule)	See sections d)(2) and e)(2), below.

(2) Additional Terms and Conditions

a. The VOC emission limit of 7.0 lbs per hour is established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with this limit.

[OAC rule 3745-31-05(A)(3) as effective on 11/30/01]

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

[OAC rule 3745-31-05(A)(3) as effective on 11/30/01]

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

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the volatile organic compound (VOC) from this emissions unit since the "controlled" potential to emit is less than ten tons per year, for each.

[OAC paragraph 3745-31-05(A)(3)(a)(ii), as effective 12/01/06]

c) Operational Restrictions

(1) The combined primer usage in emissions units R009 to R012 shall not exceed 1,900 gallons per rolling 12 month period.

[OAC paragraph 3745-31-05(D)]

(2) The combined solvent wipe, which is employed to clean the parts prior to coating, usage in emissions units R009 to R012 shall not exceed 1,036 gallons per rolling 12 month period.

[OAC paragraph 3745-31-05(D)]

(3) The VOC content of the primer employed in emissions units R009 to R012 shall not exceed 6.27 pounds of VOC per gallon, as applied.

[OAC rule 3745-31-05(A)(3) as effective on 11/30/01]

(4) The VOC content of the solvent wipe employed in emissions units R009 to R012 shall not exceed 6.58 pounds of VOC per gallon, as applied.

[OAC rule 3745-31-05(A)(3) as effective on 11/30/01]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain the following combined monthly records on all materials employed in emissions units R009 to R012:

a. the identification of all coatings, thinners, and/or solvent wipes employed;

b. the amount of coatings, thinners, and/or solvent wipes employed, in gallons, as applied;

c. the VOC content of coatings and solvent wipes, in pounds per gallon, as applied;

d. the rolling, 12-month summation of the amount of coatings employed, in gallons, as applied; and

e. the rolling, 12-month summation of the amount of solvent wipes employed, in gallons, as applied.

[OAC rule 3745-31-05(D)]

(2) Modeling to demonstrate compliance with, the “Toxic Air Contaminant Statute”, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit’s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified FEPTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials or use of new materials that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.

[ORC 3704.03(F)(3)(c) and F(4)]

e) Reporting Requirements

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

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

i. The combined primer (coating) usage in emissions units R009 to R012 exceed 1,900 gallons per rolling 12 month period.

ii. The combined solvent wipe, usage in emissions units R009 to R012 exceed 1,036 gallons per rolling 12 month period.

iii. The VOC content of the primer employed exceed 6.27 pounds of VOC per gallon, as applied.

iv. The VOC content of the solvent wipe employed exceed 6.58 pounds of VOC per gallon, as applied.

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

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

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

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

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

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

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

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

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:

7.0 pounds of VOC per hour.

The above limitation is based on the following equation:

HER= (Cu x Cvoc) + (Swu x Swvoc)

Where:

HER = Hourly emission rate, in pounds per hour;

Cu = Coating usage rate, in gallons per hour, (0.69);

Cvoc = Coating VOC content, in pounds per gallon, as applied, (6.27);

Swu = Solvent wipe usage rate, in gallons per hour, (0.39);

Swvoc = Solvent wipe VOC content, in pounds per gallon, as applied, (6.58).

Applicable Compliance Method:

Compliance shall be assumed based on the maximum coating usage rate does not exceed 0.69 gallons, VOC content of the coating does not exceed 6.27 pounds per gallon, as applied, the solvent wipe usage rate does not exceed 0.39 gallons, and VOC content of the solvent wipe does not exceed 6.58 pounds per gallon, as applied. Prior to any modification to the operation of this emissions unit that would cause an increase in the hourly VOC emissions rate; the permittee shall apply for and obtain all appropriate air pollution permits.

b. Emission Limitation:

9.4 tons of VOC per rolling 12 month period, combined, from the materials employed in emissions unit R001.

The above limitation is based on the following equation:

The above limitation is based on the following equation:

AER= [(Cu x Cvoc) + (Swu x Swvoc)]/2000

Where:

AER = Annual emission rate, in tons per hour;

Cu = Coating usage rate, in gallons per rolling 12 month period, (1,900);

Cvoc = Coating VOC content, in pounds per gallon, as applied, (6.27);

Swu = Solvent wipe usage rate, in gallons per rolling 12 month period, (1,036);

Swvoc = Solvent wipe VOC content, in pounds per gallon, as applied, (6.58).

Applicable Compliance Method:

Compliance shall be assumed based on the recordkeeping requirement established in section d) of this permit.

g) Miscellaneous Requirements

(1) None.