



**Environmental  
Protection Agency**

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

1/6/2012

Certified Mail

Mr. George Frahn  
Comfort Line Ltd.  
5500 Enterprise Blvd  
Toledo, OH 43216

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

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 0448011664  
Permit Number: P0108785  
Permit Type: Administrative Modification  
County: Lucas

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install 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, Toledo Blade. 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](http://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  
50 West Town Street, Suite 700  
P.O. Box 1049  
Columbus, Ohio 43216-1049

and Toledo Department of Environmental Services  
348 South Erie Street  
Toledo, OH 43604

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 Toledo Department of Environmental Services at (419)936-3015.

Sincerely,

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

Cc: U.S. EPA Region 5 -Via E-Mail Notification  
TDES; Michigan; Indiana; Canada





## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Comfort Line Ltd. Is a manufacturer of extruded plastics operating in Lucas County. The facility is a major source of HAPs (styrene) and is permitted as a Title V source. Comfort Line requested a modification of their Title V permit to incorporate the requirements of OAC 3734-21-25 (RPC RACT rule), and incorporate new particulate matter control and operating requirements. During the review of that permit it was determined that a modification to the 2009 permit to install P0104626 would be required to comply with the 7/2/2010 OEPA guidance for the issuance of BAT determinations under the SB265 action.

This emissions unit is a coating dryer oven (P014) which utilizes a 1.8 mmBtu per hour direct fired natural gas burner. All criteria pollutant emissions from this source are less than 10 tons per year and will qualify for an exemption from a BAT determination on approval of the SIP.

3. Facility Emissions and Attainment Status:

There is a 90 TPY federally enforceable plant-wide limit on VOC emissions at this facility. All other pollutants are emitted in minor quantities. Lucas county is not classified or in attainment status for all criteria air pollutants.

4. Source Emissions (P014 only):

Pollutant	lb/hr	Emissions
		(ton/yr)
CO	0.15	0.66
NOx	0.18	0.79
PE	0.01	0.05
SO2	0.01	0.05
VOC	1.16	5.09

5. Conclusion:

This permit modification does not substantially change the 2009 permit determination and should be issued draft/final as non-controversial.

6. Please provide additional notes or comments as necessary:

Combustion emissions will be calculated based on emission factors provided in AP-42 "EMISSION FACTORS FOR CRITERIA POLLUTANTS AND GREENHOUSE GASES FROM NATURAL GAS COMBUSTION", Table 1.4-2 dated 7/98, 1.8 mmBtu/hr maximum heat input rate, a fuel heat value of 1020 Btu per cubic foot of natural gas and 8760 hours per year of operation:



Table with 4 columns: Pollutant, AP-42\* (lb/mmcuft NG), Emissions (lb/hr), Emissions (ton/yr). Rows include CO, NOx, PE, SO2, and VOC.

Example calculation for CO:

(84 #/mmcuft ÷ 1020 Btu/cuft) x (1.8 mmBtu/hr) = 0.15 # CO/hr
(0.15 # CO/hr) x (8760 hr/yr) ÷ (2000 #/T) = 0.66 tpy CO

The booth/oven split in emissions is estimated as 5/95 by weight. This low rate of VOC carry-over is attributed to a minimum transfer time from the coating booth to drying oven of 45 minutes. The usage of coatings in lines K001 & K002 are restricted by permit limitations to 15#/hr (K001) and 8#/hr (K002).

(15#/hr + 8#/hr) (0.05) = 1.15 #/hr
1.15 #/hr (8760 hr/yr) ÷ (2000 #/T) = 5.04 tpy VOC

In response to guidance from OEPA we will also remove now obsolete references to OAC rules 3745-21-07 and 21-08 from the permit.

Please note: Since this is a direct fired drying oven only, there is no applicable process weight and OAC rule 3745-17-11 sets no emissions limitation. Therefore the process is exempted from OAC rule 3745-17-07 visible emissions requirements by the exemption of 17-07(A)(3)(h).

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

Table with 2 columns: Pollutant, Tons per Year. Rows include CO, NOx, PE, SO2, and VOC.

PUBLIC NOTICE  
1/6/2012 Issuance of Draft Air Pollution Permit-To-Install

Comfort Line Ltd.  
5500 Enterprise Blvd,  
Toledo, OH 43612  
Lucas County

FACILITY DESC.: All Other Plastics Product Manufacturing

PERMIT #: P0108785

PERMIT TYPE: Administrative Modification

PERMIT DESC: Administrative modification to bring the Chapter 31 determination of the 2009 PTI into conformity with the BAT guidance of 7/2/2010 during the company requested updating of the Title V permit.

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: Danny Pittman, Toledo Department of Environmental Services, 348 South Erie Street, Toledo, OH 43604. Ph: (419)936-3015





**DRAFT**

**Division of Air Pollution Control  
Permit-to-Install  
for  
Comfort Line Ltd.**

Facility ID:	0448011664
Permit Number:	P0108785
Permit Type:	Administrative Modification
Issued:	1/6/2012
Effective:	To be entered upon final issuance





Division of Air Pollution Control
Permit-to-Install
for
Comfort Line Ltd.

Table of Contents

Authorization ..... 1
A. Standard Terms and Conditions ..... 3
1. Federally Enforceable Standard Terms and Conditions ..... 4
2. Severability Clause ..... 4
3. General Requirements ..... 4
4. Monitoring and Related Record Keeping and Reporting Requirements ..... 5
5. Scheduled Maintenance/Malfunction Reporting ..... 6
6. Compliance Requirements ..... 6
7. Best Available Technology ..... 7
8. Air Pollution Nuisance ..... 7
9. Reporting Requirements ..... 7
10. Applicability ..... 8
11. Construction of New Sources(s) and Authorization to Install ..... 8
12. Permit-To-Operate Application ..... 9
13. Construction Compliance Certification ..... 9
14. Public Disclosure ..... 9
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations ..... 10
16. Fees ..... 10
17. Permit Transfers ..... 10
18. Risk Management Plans ..... 10
19. Title IV Provisions ..... 10
B. Facility-Wide Terms and Conditions ..... 11
C. Emissions Unit Terms and Conditions ..... 14
1. P014, Coating Dryer Oven ..... 15



## Authorization

Facility ID: 0448011664  
Facility Description: Manufacture of extruded plastics  
Application Number(s): M0001394  
Permit Number: P0108785  
Permit Description: Administrative modification to bring the Chapter 31 determination of the 2009 PTI into conformity with the BAT guidance of 7/2/2010 during the company requested updating of the Title V permit.  
Permit Type: Administrative Modification  
Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*  
Issue Date: 1/6/2012  
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Comfort Line Ltd.  
5500 Enterprise Blvd  
Toledo, OH 43612

of a Permit-to-Install 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:

Toledo Department of Environmental Services  
348 South Erie Street  
Toledo, OH 43604  
(419)936-3015

The above named entity is hereby granted a Permit-to-Install for the 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 emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally  
Director



## **Authorization (continued)**

Permit Number: P0108785

Permit Description: Administrative modification to bring the Chapter 31 determination of the 2009 PTI into conformity with the BAT guidance of 7/2/2010 during the company requested updating of the Title V permit.

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

<b>Emissions Unit ID:</b>	<b>P014</b>
Company Equipment ID:	P014
Superseded Permit Number:	P0104626
General Permit Category and Type:	Not Applicable



## **A. Standard Terms and Conditions**



## 1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
  - (1) Standard Term and Condition A.2.a), Severability Clause
  - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
  - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
  - (4) Standard Term and Condition A.9., Reporting Requirements
  - (5) Standard Term and Condition A.10., Applicability
  - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
  - (7) Standard Term and Condition A.14., Public Disclosure
  - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (9) Standard Term and Condition A.16., Fees
  - (10) Standard Term and Condition A.17., Permit Transfers

## 2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

## 3. General Requirements

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

- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

#### **4. Monitoring and Related Record Keeping and Reporting Requirements**

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Toledo Department of Environmental Services.

- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Toledo Department of Environmental Services. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
  - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Toledo Department of Environmental Services every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
  - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## 5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Toledo Department of Environmental Services in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

## 6. Compliance Requirements

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Toledo Department of Environmental Services concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
  - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

## **7. Best Available Technology**

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

## **8. Air Pollution Nuisance**

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

## **9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Toledo Department of Environmental Services.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission

limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Toledo Department of Environmental Services. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

## 10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

## 11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" 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).

- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

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

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

## 12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

## 13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

## 14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.



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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

**16. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

**18. Risk Management Plans**

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

**19. Title IV Provisions**

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

## **B. Facility-Wide Terms and Conditions**

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - a) None.
2. The combined emissions of volatile organic compounds (VOC) from all emission units at this facility shall not exceed 90.00 tons per year, based upon a rolling, 12-month summation of the monthly emissions. The combined emissions of VOC shall include the following emission units: K001, K002, P001, P002, P003, P004, P005, P006 and P014.
3. The permittee shall collect and record the following information monthly for the purpose of determining compliance with the rolling, 12-month VOC emission limitation:
  - a) for K001, K002 and P014:
    - (1) the company identification for each coating material employed;
    - (2) the number of gallons of each coating, as employed;
    - (3) the organic compound content of each coating, as employed, in pounds per gallon;
    - (4) the total VOC emission rate for all coatings employed calculated as a summation of a)(2) x a)(3) for all coatings, in pounds per month;
  - b) for P001:
    - (1) the company identification of each resin employed;
    - (2) the weight of each resin employed in pounds;
    - (3) the VOC content of each resin employed (e.g. styrene), in percent by weight;
    - (4) the total VOC emission rate for all resin employed calculated as the summation of b)(2) x b)(3) for all resins multiplied by the emissions factor of 0.01 pound VOC per pound of available VOC content (AP-42 Chapter 6.4, Table 6.4-1 dated 1/95), in pounds per month;
  - c) for P002, P003, P004, P005 and P006:
    - (1) the company identification of each resin employed;
    - (2) the weight of each resin employed in pounds;
    - (3) the VOC content of each resin employed (e.g. styrene), in percent by weight;
    - (4) the total VOC emission rate for all resin employed calculated as the summation of c)(2) x c)(3) for all resins multiplied by the emissions factor of 0.04 pound VOC per pound of available VOC content (AP-42 Chapter 6.4, Table 6.4-1 dated 1/95), in pounds per month;



- d) for all emissions units facility-wide:
    - (1) the company identification for each cleanup material employed;
    - (2) the volume of each cleanup material applied in gallons;
    - (3) the VOC content of each cleanup material applied in pounds per gallon;
    - (4) the total VOC emission rate for all clean-up materials employed calculated as a summation of d)(2) x d)(3) for all cleanup materials, in pounds per month;
  - e) the monthly VOC emissions rate from all emissions units, calculated as a summation of the total VOC emissions rates from all coatings, resins and clean-up materials recorded above divided by 2000 pounds per ton, in tons per month; and
  - f) the rolling, 12-month summation of the VOC emissions, calculated by adding the current month's VOC emissions from all emission units at this facility to the VOC emissions for the preceding eleven calendar months from all emission units at this facility, in tons.
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC. These reports shall be submitted in accordance with the reporting requirements specified in the Standard Terms and Conditions, of this permit.

## **C. Emissions Unit Terms and Conditions**



1. P014, Coating Dryer Oven

Operations, Property and/or Equipment Description:

Direct Gas-Fired Drying Oven associated with K001 and K002 and having a maximum heat input rate of 1.8 mmBtu/hr

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. 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), as effective 11/30/01	<p>The emissions of carbon monoxide (CO) from the stack serving this emission unit shall not exceed 0.15 pound per hour and 0.66 ton per rolling, 12-month period.</p> <p>The emissions of nitrogen oxides (NOx) from the stack serving this emission unit shall not exceed 0.18 pound per hour and 0.79 ton per rolling, 12-month period.</p> <p>Particulate emissions (PE) from the stack serving this emission unit shall not exceed 0.01 pound per hour and 0.05 ton per rolling, 12-month period.</p> <p>The emissions of sulfur dioxide (SO2) from the stack serving this emission unit shall not exceed 0.01 pound per hour and 0.05 ton per rolling, 12-month period.</p> <p>The emissions of volatile organic compounds (VOC) from the stack serving this emission unit shall not exceed 1.16 pounds per hour and 5.09 tons per rolling, 12-month period.</p> <p>See b)(2)a. through b)(2)c.</p>

b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/1/06	See b)(2)d.
c.	OAC rule 3745-17-07(A)(1)	Exempted by the provisions of OAC rule 3745-17-07(A)(3)(h) as there is no applicable process weight rate (PWR) limitation established under OAC rule 3745-17-11.
d.	OAC rule 3745-18-06(A)	See b)(2)e.

(2) Additional Terms and Conditions

- a. The hourly and annual emission limitations for CO, NOx, PE and SO2 from the combustion of natural gas were established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.
- b. The hourly and annual emission limitations for VOC are based on the maximum emissions from the combustion of natural gas added to 5% of the maximum emissions of VOC from coating lines K001 and K002, and represent the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.
- c. 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 pollutant less than ten tons per year. However, that rule revision has not been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.
- d. The following terms and conditions apply once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.
  - i. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the CO, NOx, PE, SO2 and VOC emissions from this source since the uncontrolled annual emissions rate for each pollutant is less than 10 tons/yr.
- e. OAC rule 3745-18-06(A) does not establish SO2 emission limitations for the fuel burning equipment associated with this emissions unit because the emissions unit only employs natural gas as fuel. However, OAC rule 3745-18-06(A)

requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas being burned in this emission unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).

On September 1, 2003, OAC rule 3745-18-06 was revised to delete the following phrase: "having a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pounds per million standard cubic feet". Therefore, this phrase is no longer part of the State regulations. However, that rule revision has not yet been submitted to 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 OAC rule 3745-18-06, the requirements still exists as part of the federally-approved SIP for Ohio.

c) Operational Restrictions

- (1) The permittee shall only burn natural gas in the dryer oven.

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas in the dryer oven, the permittee shall maintain a record of the type and quantity of fuel burned.

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned as fuel. Each report shall be submitted to the Toledo Division of Environmental Services within 30 days after the deviation occurs.
- (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

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

a. Emission Limitation:

0.15 pound CO per hour.

Applicable Compliance Method:

This emissions limitation was established based on emission factors specified in AP 42, Table 1.4-1, dated July 1998, as follows: divide the emission factor of 84 pounds of CO emissions per million standard cubic feet by a heating value of

1,020 Btu per standard cubic foot and multiply by the maximum burner hat input capacity of 1.8 mmBtu per hour.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 10 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

b. Emission Limitation:

0.66 ton of CO per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the emission limitation of 0.15 pound of CO per hour by 8,760 hours per year and divide by 2,000 pounds per ton.

c. Emission Limitation:

0.18 pound NO<sub>x</sub> per hour.

Applicable Compliance Method:

This emissions limitation was established based on emission factors specified in AP 42, Table 1.4-1, dated July 1998 as follows: divide the emission factor of 100 pounds of NO<sub>x</sub> emissions per million standard cubic feet by a heating value of 1,020 Btu per standard cubic foot and multiply by the maximum burner hat input capacity of 1.8 mmBtu per hour.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 7 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

d. Emission Limitation:

0.79 ton of NO<sub>x</sub> per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the emission limitation of 0.18 pound of NO<sub>x</sub> per hour by 8,760 hours per year and divide by 2,000 pounds per ton.

e. Emission Limitation:

0.01 pound PE per hour.

**Applicable Compliance Method:**

This emissions limitation was established based on emission factors specified in AP 42, Table 1.4-2, dated July 1998, as follows: divide the emission factor of 1.9 pounds of PE emissions per million standard cubic feet by a heating value of 1,020 Btu per standard cubic foot and multiply by the maximum burner heat input capacity of 1.8 mmBtu per hour.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60 Appendix A. Alternatively, other U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

**f. Emission Limitation:**

0.05 ton of PE per rolling, 12-month period.

**Applicable Compliance Method:**

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the emission limitation of 0.01 pound of PE per hour by 8,760 hours per year and divide by 2,000 pounds per ton.

**g. Emission Limitation:**

0.01 pound SO<sub>2</sub> per hour.

**Applicable Compliance Method:**

This emissions limitation was established based on emission factors specified in AP 42, Table 1.4-2, dated July 1998, as follows: divide the emission factor of 0.6 pound of SO<sub>2</sub> emissions per million standard cubic feet by a heating value of 1,020 Btu per standard cubic foot and multiply by the maximum burner hat input capacity of 1.8 mmBtu per hour.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 6 of 40 CFR Part 60 Appendix A. Alternatively, other U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

**h. Emission Limitation:**

0.05 ton of SO<sub>2</sub> per rolling, 12-month period.

**Applicable Compliance Method:**

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations

performed as follows: multiply the emission limitation of 0.01 pound of SO<sub>2</sub> per hour by 8,760 hours per year and divide by 2,000 pounds per ton.

i. Emission Limitation:

1.16 pounds VOC per hour.

Applicable Compliance Method:

This emissions limitation was established to represent the potential to emit of VOC from the products of combustion of natural gas from a 1.8 mmBtu per hour oven and 5% of the maximum rate of emission of VOC coating from coating lines K001 and K002, as follows:

the products of combustion of natural gas from a 1.8 mmBtu per hour oven are based on emission factors specified in AP 42, Table 1.4-2, dated July 1998, as follows: divide the emission factor of 5.5 pounds of VOC emissions per million standard cubic feet by a heating value of 1,020 Btu per standard cubic foot and multiply by the maximum burner hat input capacity of 1.8 mmBtu per hour (0.01 pound of VOC per hour);

the emissions from the drying of coatings are based a booth/oven split of 95/5 by weight. The emissions of VOC from coating lines K001 & K002 are restricted by permit limitations to 15#/hr from K001 and 8#/hr from K002  $((15+8)(0.05) = 1.15$  pound of VOC per hour).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 25 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-21-10. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

j. Emission Limitation:

5.09 tons of VOC per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the emission limitation of 1.16 pounds of VOC per hour by 8,760 hours per year and divide by 2,000 pounds per ton.

g) Miscellaneous Requirements

- (1) When this drying oven is operating, for purposes of calculating the organic compound emission rates for this emissions unit and the associated spray booths (K001 & K002), the permittee shall utilize a value of 95% as the maximum percentage of the organic compounds employed in the spray booth that are emitted uncontrolled from the spray



booth. The remaining 5% of the organic compounds employed in the spray booth shall be considered to be the uncontrolled emissions for this emissions unit. This "split" of organic compound emissions between this emissions unit and the associated spray booth is based upon the amounts reported in the application.