



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
ALLEN COUNTY**

CERTIFIED MAIL

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov.
Center

Application No: 03-13938

DATE: 8/28/2003

DTR Industries Inc
Kevin Gearig
320 Snider Rd
Bluffton, OH 45817

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

Sincerely,

Michael W. Ahern

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

NWDO



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install
Terms and Conditions**

**Issue Date: 8/28/2003
Effective Date: 8/28/2003**

FINAL PERMIT TO INSTALL 03-13938

Application Number: 03-13938
APS Premise Number: 0302000166
Permit Fee: **\$10600**
Name of Facility: DTR Industries Inc
Person to Contact: Kevin Gearig
Address: 320 Snider Rd
Bluffton, OH 45817

Location of proposed air contaminant source(s) [emissions unit(s)]:

**320 Snider Rd
Bluffton, Ohio**

Description of proposed emissions unit(s):

3 water-based paint spray machines and 3 submerged assembling machines, and six solvent-based painting operations.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described 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



Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping 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:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. 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:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. 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 appropriate Ohio EPA District Office or local air agency. The written

reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., 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.
- iv. 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.

2. 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 appropriate Ohio EPA District Office or local air agency 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).

3. 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.

4. 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.

5. Severability Clause

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

6. General Requirements

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

7. 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 this Permit To Install.

8. Federal and State Enforceability

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

9. Compliance Requirements

- a. 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.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. 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.
 - ii. 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.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. 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.

10. Permit To Operate Application

- a. If 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).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

12. 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.

B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. 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 appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (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 appropriate Ohio EPA District Office or local air agency. 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., 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.)

3. Permit Transfers

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

4. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

5. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. 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 the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install 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.

6. 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.

7. 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).

8. Construction Compliance Certification

DTR Industries Inc
PTI Application: **03-13938**
Issued: 8/28/2003

Facility ID: **0302000166**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

9. **Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)**

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., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. **Permit To Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	320.50
PE	12.09

12

DTR Industries Inc

PTI Application: **03-13938**

Issued: 8/28/2003

Facility ID: **0302000166**

13

DTR I

PTI A₁

Issued: 8/28/2003

Emissions Unit ID: K004

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property,
and/or Equipment

Applicable Rules/Requirements

OAC rule 3745-17-07(A)

K004 - Auto adhesive spray
#1 (B30) miscellaneous
metal parts coating operation
(modification to PTI
03-10256, issued 3/1/01).
Modification to increase
synthetic minor group limit
from 160 TPY OC to 255
TPY OC.

OAC rule 3745-31-05(A)(3)

OAC rule 3745-31-05(D)

OAC rule 3745-21-09(U)(2)(f)

OAC rule 3745-17-11(B)

Applicable Emissions
Limitations/Control
Measures

Use of water wash or dry
filtration system

7.0 lbs volatile organic
compounds (VOC)/gallon of
coating, excluding water and
exempt solvents (see Section
A.I.2.b.)

7.07 lbs organic compounds
(OC)/hour, 30.97 tons
OC/year (is inclusive of
clean-up materials)

0.10 lb particulate emissions
(PE)/hour, 0.44 ton PE/year

Visible PE shall not exceed
0% opacity, as a six-minute
average

255 tons OC per rolling,
365-day period, from all the
emission units identified in
A.I.2.a. (see Section
A.I.2.a.)

see Section A.I.2.b.

see Section A.I.2.c.

see Section A.I.2.c.

2. Additional Terms and Conditions

- 2.a** The permittee has requested a federally enforceable limitation of 255 tons OC per rolling, 365-day period from Anti-Vibration Adhesive Coating operations, emissions units: K004,

K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048 combined for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.

Rolling limits for Anti-Vibration Adhesive Coating operations were established in Permit to Install (PTI) 03-10256 which was issued on March 1, 2001, and as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability OC limitations effectively restrict VOC emissions.

- 2.b** PTI #03-10256 was issued on March 1, 2001, with terms and conditions that defined best available technology as 7.0 lbs VOC/gallon of coating, excluding water and exempt solvents, in accordance with the requirements of OAC rule 3745-21-09(U)(2)(f).
- 2.c** The emission limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d** For the purposes of federal enforceability OC limitations effectively restrict VOC emissions.

II. Operational Restrictions

- 1. The permittee shall operate the water wash or dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
- 2. In order to demonstrate compliance with the 255 tons per rolling 365-day period and the 7.0 lbs VOC/gallon of coating, excluding water and exempt solvents, the permittee shall collect and record the following each day for emission units: K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048 combined.
 - a. the name and identification number of each coating and cleanup material;
 - b. the OC content of each coating and cleanup material, as applied;
 - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in

Emissions Unit ID: K004

lbs/gallon, [The VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{voc,2}$];

- d. the number of gallons of each coating and cleanup material employed;

- e. the OC emission rates from each coating and cleanup material employed (b x d); and
- f. the total OC emission rate from all coatings and cleanup material employed, (summation of e); and
- g. the rolling 365-day summation of the total OC emission rate.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit deviation (excursion) reports for emissions unit K004 which identify exceedances of any of the following:
 - a. any exceedances of the volatile organic compound content restrictions in section A.I.2.b. of this permit; and
 - b. any exceedances of the 255 tons OC per rolling, 365-day period for Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048.

V. Testing Requirements

1. Compliance with the emission limitations in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. **Emission Limitation**
7.07 lbs OC/hour

Applicable Compliance Method

The hourly OC emission limitation is based on the emission units potential to emit.* Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit is based on a two-part coating system of primer and topcoat,

19

DTR I

PTI A₁

Issued: 8/28/2003

Emissions Unit ID: K004

including cleanup materials, with a maximum usage of 1.01 gallon/hour at a maximum OC content of 7.0 lbs/gallon.

- b. **Emission Limitation**
30.97 tons OC/year

Applicable Compliance Method

The annual emission limitation for this emission unit was based on the emission unit's potential to emit.* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was established by multiplying the lbs OC/hour limitation by the maximum operating hours, 8760 hours/year and dividing by 2000 lbs/ton.

- c. **Emission Limitation**
0.10 lb PE/hour, 0.44 ton PE/year

Applicable Compliance Method

Compliance with the PE limitations shall be determined in accordance with the following:

The permittee may calculate the actual PE rates utilizing the following equation:

$$E = (\text{maximum coating solids usage rate in lbs/hr}) \times (1-TE) \times (1-CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

TE = Transfer Efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = Control Efficiency of the control equipment

Annual emissions shall be calculated based on multiplying E by the annual operating schedule for the emissions unit and dividing by 2000 lbs per ton.

If required, compliance with the PE limitations shall be based on stack testing in accordance with 40 CFR Part 60, Appendix A- Test Methods 1-5.

- d. **Emission Limitation**
Visible PE shall not exceed 0% opacity, as a six-minute average

Applicable Compliance Method

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

- e. **Emission Limitation**
255 tons OC per rolling 365-day period from all Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046 and K048 combined.
- Applicable Compliance Method**
Compliance with this limitation shall be determined by recordkeeping in section A.III.2. of this permit.
- f. **Emission Limitation**
7.0 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents
- Applicable Compliance Method**
Compliance with this limitation shall be determined by recordkeeping in section A.III.2 of this permit. Any determination of VOC content (VOC means all volatile organic compounds that in a coating material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K004 - Auto adhesive spray #1 (B30) miscellaneous metal parts coating operation (modification to PTI 03-10256, issued 3/1/01). Modification to increase synthetic minor group limit from 160 TPY OC to 255 TPY OC.	See below	See below

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit K004 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application, the SCREEN 3.0 and Industrial Source Complex - Short Term III models. The predicted 1-hour maximum ground-level concentration from the use of the models was compared to the Maximum

Acceptable Ground-Level Concentration (MAGLC). This emissions unit was previously modeled in PTI #03-10256. The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Tetrachloroethylene

TLV (ug/m3): 170

Maximum Hourly Emission Rate (lbs/hr): 2.99

Predicted 1 Hour Maximum Ground-Level Concentration at or beyond the Fenceline (ug/m3): 2225*

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 4048

Pollutant: Xylene

TLV (ug/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 13.12

Predicted 1 Hour Maximum Ground-Level Concentration at or beyond the Fenceline (ug/m3): 9758*

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 10333

Pollutant: Ethyl Benzene**

TLV (ug/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 4.18

Predicted 1 Hour Maximum Ground-Level Concentration at or beyond the Fenceline (ug/m3): 3353*

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 10333

Pollutant: Toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 16.46

Predicted 1 Hour Maximum Ground-Level Concentration at or beyond the Fenceline (ug/m3): 1418***

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 4476

Pollutant: Methyl Isobutyl Ketone

TLV (ug/m3): 205,000

Maximum Hourly Emission Rate (lbs/hr): 23.87

Predicted 1 Hour Maximum Ground-Level Concentration at or beyond the Fenceline (ug/m3): 2220***

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 4881

Emissions Unit ID: K004

* Based on Screen 3 model

** The following additional conservative assumptions were made in the Screen modeling:

The remaining emissions of toxic compounds excluding Tetrachloroethylene, Toluene, Methyl Isobutyl Ketone, and Xylene in the coatings or cleaning materials were assumed to be Ethyl Benzene which has the lowest TLV of the remaining toxic compounds.

*** Based on ISCST3 model

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

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

IV. Reporting Requirements

None

V. Testing Requirements

None

26

DTR Industries Inc
PTI Application: 02 12020
Issued

Facility ID: 0302000166

Emissions Unit ID: K004

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K006 - Paint Spray Machine No. 1, (B40-1) Modification to PTI # 03-13807 issued on 12/05/02 to increase the synthetic minor group limit from 8 TPY OC to 18 TPY OC.	OAC rule 3745-31-05 (A)(3)	Use of water wash or dry filtration system 0.63 lb organic compounds (OC)/hr, 2.76 tons OC/yr 0.13 lb particulate emissions (PE)/hr, 0.57 tons PE/yr 0% opacity as a six-minute average
	OAC rule 3745-17-07(A)	See A.I.2.a.
	OAC rule 3745-17-11(B)	See A.I.2.b.
	OAC rule 3745-21-09(U)(1)(c)	See A.I.2.b. 3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, for an extreme performance coating.
	OAC rule 3745-31-05(D)	18.0 tons OC per rolling, 365-day period, from all the emission units identified in A.I.2.c. (see Section A.I.2.c)

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with OAC rule 3745-21-09(U)(1)(c) and OAC rule 3745-31-05(D).
- 2.b The emission limit specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.c The permittee has requested a federally enforceable limitation of 18 tons OC per rolling, 365-day period from Anti-Vibration Water-Borne Painting operations, emissions units: K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.

Rolling limits for Anti-Vibration Adhesive Coating operations were established in Permit to Install (PTI) 03-13807 which was issued on December 5, 2002, and as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability OC limitations effectively restrict VOC emissions.

II. Operational Restrictions

- 1. The permittee shall operate the water wash system or the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain daily records that document any time periods when the water wash system or the dry filtration system was not in service when the emissions unit was in operation.
- 2. In order to demonstrate compliance with the 18 tons per rolling 365-day period and the 3.5 lbs VOC/gallon of coating, excluding water and exempt solvents, the permittee shall collect and record the following each day for emission units: K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined.
 - a. the name and identification number of each coating, employed;
 - b. the OC content of each coating, in lbs/gallon, as applied;
 - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gallon, [The VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{voc,2}$];

- d. the number of gallons of each coating employed;
- e. the OC emission rates from each coating employed (b x d) in lbs; and
- f. the total OC emission rate from all coatings and cleanup material employed, in lbs (summation of e); and
- g. the rolling 365-day summation of the total OC emission rate, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the water wash system or the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.
2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit deviation (excursion) reports for emissions unit K006 which identify exceedances of any of the following:
 - a. any exceedances of the 3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, content restriction; and
 - b. any exceedances of the 18 tons OC per rolling, 365-day period for Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
 - a. **Emission Limitation**
0.63 lb OC/hr and 2.76 TPY OC

Applicable Compliance Method

The hourly OC emission limitation is based on the emissions unit's potential to emit*. Therefore, no recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance. The TPY limitation was developed by multiplying the lb/hr limitation by a maximum operating schedule of 8760 hrs per year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

*The potential to emit for this emissions unit was based on a maximum hourly gallon usage of 0.62 gallons per hour and a maximum OC content of 1.01 lbs per gallon.

- b. **Emission Limitation**
0.13 lb PE/hr and 0.57 TPY PE

Applicable Compliance Method

The permittee shall demonstrate compliance with this limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate in lbs/hr}) \times (1 - TE)(1 - CE)$$

where:

E = PE rate (lbs/hr)

TE = Transfer Efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = Control Efficiency of the control equipment

Annual emissions shall be calculated based on multiplying E by the annual operating schedule for the emissions unit and dividing by 2000 lbs per ton.

If required, compliance with the PE limitations shall be based on stack testing in accordance with 40 CFR Part 60, Appendix A- Test Methods 1-5.

c. **Emission Limitation**

18 tons OC per rolling 365-day period from all Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined.

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.2 of this permit.

d. **Emission Limitation**

0% opacity as a six minute average

Applicable Compliance Method

If required, compliance with the visible PE limitation shall be determined in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

e. **Emission Limitation**

3.5 lbs VOC per gallon of coating, excluding water and exempt solvent

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.2 of this permit. Any determination of VOC content (VOC means all volatile organic compounds that in a coating material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids contents, or density of coating material shall be based

on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K006 - Paint Spray Machine No. 1, (B40-1) Modification to PTI # 03-13807 issued on 12/05/02 to increase the synthetic minor group limit from 8 TPY OC to 18 TPY OC.	See below	See below

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit K006 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application, the SCREEN 3.0 and Industrial Source Complex - Short Term III models. The predicted 1-hour maximum ground-level concentration from the use of the models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Triethylamine
 TLV (mg/m3): 4.21
 Maximum Hourly Emission Rate (lbs/hr): 0.95
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 87.37 *

MAGLC (ug/m3): 100.24

Pollutant: 2-Butoxyethanol

TLV (mg/m3): 98.2

Maximum Hourly Emission Rate (lbs/hr): 4.40

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 2075 **

MAGLC (ug/m3): 2338

* Based on ISCST3 model

** Based on Screen 3 model

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

Emissions Unit ID: K006

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

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

- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	OAC rule 3745-17-07(A)
K009 - Auto adhesive spray #2 (B95) miscellaneous metal parts coating operation (modification to PTI 03-10256, issued 3/1/01). Modification to increase synthetic minor group limit from 160 TPY OC to 255 TPY OC.	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-31-05(D)	
	OAC rule 3745-21-09(U)(2)(f)	
	OAC rule 3745-17-11(B)	

Applicable Emissions
Limitations/Control
Measures

Use of water wash or dry
filtration system

7.0 lbs volatile organic
compounds (VOC)/gallon of
coating, excluding water and
exempt solvents (see Section
A.I.2.b.)

7.07 lbs organic compounds
(OC)/hour, 30.97 tons
OC/year (is inclusive of
clean-up materials)

0.10 lb particulate emissions
(PE)/hour, 0.44 ton PE/year

Visible PE shall not exceed
0% opacity, as a six-minute
average

255 tons OC per rolling,
365-day period, from all the
emission units identified in
A.I.2.a. (see Section
A.I.2.a.)

see Section A.I.2.b.

see Section A.I.2.c.

see Section A.I.2.c.

2. Additional Terms and Conditions

2.a The permittee has requested a federally enforceable limitation of 255 tons OC per rolling, 365-day period from Anti-Vibration Adhesive Coating operations, emissions units: K004,

K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048 combined for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.

Rolling limits for Anti-Vibration Adhesive Coating operations were established in Permit to Install (PTI) 03-10256 which was issued on March 1, 2001, and as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability OC limitations effectively restrict VOC emissions.

- 2.b** PTI #03-10256 was issued on March 1, 2001, with terms and conditions that defined best available technology as 7.0 lbs VOC/gallon of coating, excluding water and exempt solvents, in accordance with the requirements of OAC rule 3745-21-09(U)(2)(f).
- 2.c** The emission limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d** For the purposes of federal enforceability OC limitations effectively restrict VOC emissions.

II. Operational Restrictions

- 1. The permittee shall operate the water wash or dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
- 2. In order to demonstrate compliance with the 255 tons per rolling 365-day period and the 7.0 lbs VOC/gallon of coating, excluding water and exempt solvents, the permittee shall collect and record the following each day for emission units: K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048 combined.
 - a. the name and identification number of each coating and cleanup material;
 - b. the OC content of each coating and cleanup material, as applied;
 - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in

Emissions Unit ID: K009

lbs/gallon, [The VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{\text{voc},2}$];

- d. the number of gallons of each coating and cleanup material employed;

- e. the OC emission rates from each coating and cleanup material employed (b x d); and
- f. the total OC emission rate from all coatings and cleanup material employed, (summation of e); and
- g. the rolling 365-day summation of the total OC emission rate.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit deviation (excursion) reports for emissions unit K009 which identify exceedances of any of the following:
 - a. any exceedances of the volatile organic compound content restrictions in section A.I.2.b. of this permit; and
 - b. any exceedances of the 255 tons OC per rolling, 365-day period for Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048.

V. Testing Requirements

1. Compliance with the emission limitations in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. **Emission Limitation**
7.07 lbs OC/hour

Applicable Compliance Method

The hourly OC emission limitation is based on the emission units potential to emit.* Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit is based on a two-part coating system of primer and topcoat,

42

DTR I

PTI A₁

Issued: 8/28/2003

Emissions Unit ID: K009

including cleanup materials, with a maximum usage of 1.01 gallon/hour at a maximum OC content of 7.0 lbs/gallon.

- b. **Emission Limitation**
30.97 tons OC/year

Applicable Compliance Method

The annual emission limitation for this emission unit was based on the emission unit's potential to emit.* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was established by multiplying the lbs OC/hour limitation by the maximum operating hours, 8760 hours/year and dividing by 2000 lbs/ton.

- c. **Emission Limitation**
0.10 lb PE/hour, 0.44 ton PE/year

Applicable Compliance Method

Compliance with the PE limitations shall be determined in accordance with the following:

The permittee may calculate the actual PE rates utilizing the following equation:

$$E = (\text{maximum coating solids usage rate in lbs/hr}) \times (1-TE) \times (1-CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

TE = Transfer Efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = Control Efficiency of the control equipment

Annual emissions shall be calculated based on multiplying E by the annual operating schedule for the emissions unit and dividing by 2000 lbs per ton.

If required, compliance with the PE limitations shall be based on stack testing in accordance with 40 CFR Part 60, Appendix A- Test Methods 1-5.

- d. **Emission Limitation**
Visible PE shall not exceed 0% opacity, as a six-minute average

Applicable Compliance Method

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

- e. **Emission Limitation**
255 tons OC per rolling 365-day period from all Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046 and K048 combined.
- Applicable Compliance Method**
Compliance with this limitation shall be determined by recordkeeping in section A.III.2. of this permit.
- f. **Emission Limitation**
7.0 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents
- Applicable Compliance Method**
Compliance with this limitation shall be determined by recordkeeping in section A.III.2 of this permit. Any determination of VOC content (VOC means all volatile organic compounds that in a coating material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K009 - Auto adhesive spray #2 (B95) miscellaneous metal parts coating operation (modification to PTI 03-10256, issued 3/1/01). Modification to increase synthetic minor group limit from 160 TPY OC to 255 TPY OC.	See below	See below

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

- 1. The permit to install for this emissions unit K009 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application, the SCREEN 3.0 and Industrial Source Complex - Short Term III models. The predicted 1-hour maximum ground-level concentration from the use of the models was compared to the Maximum

Acceptable Ground-Level Concentration (MAGLC). This emissions unit was previously modeled in PTI #03-10256. The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Tetrachloroethylene

TLV (ug/m³): 170

Maximum Hourly Emission Rate (lbs/hr): 2.99

Predicted 1 Hour Maximum Ground-Level Concentration at or beyond the Fenceline (ug/m³): 2225*

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 4048

Pollutant: Xylene

TLV (ug/m³): 434

Maximum Hourly Emission Rate (lbs/hr): 13.12

Predicted 1 Hour Maximum Ground-Level Concentration at or beyond the Fenceline (ug/m³): 9758*

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 10333

Pollutant: Ethyl Benzene**

TLV (ug/m³): 434

Maximum Hourly Emission Rate (lbs/hr): 4.18

Predicted 1 Hour Maximum Ground-Level Concentration at or beyond the Fenceline (ug/m³): 3353*

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 10333

Pollutant: Toluene

TLV (ug/m³): 188,000

Maximum Hourly Emission Rate (lbs/hr): 16.46

Predicted 1 Hour Maximum Ground-Level Concentration at or beyond the Fenceline (ug/m³): 1418***

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 4476

Pollutant: Methyl Isobutyl Ketone

TLV (ug/m³): 205,000

Maximum Hourly Emission Rate (lbs/hr): 23.87

Predicted 1 Hour Maximum Ground-Level Concentration at or beyond the Fenceline (ug/m³): 2220***

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 4881

Emissions Unit ID: K009

* Based on Screen 3 model

** The following additional conservative assumptions were made in the Screen modeling:

The remaining emissions of toxic compounds excluding Tetrachloroethylene, Toluene, Methyl Isobutyl Ketone, and Xylene in the coatings or cleaning materials were assumed to be Ethyl Benzene which has the lowest TLV of the remaining toxic compounds.

*** Based on ISCST3 model

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

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

IV. Reporting Requirements

None

V. Testing Requirements

None

49

DTR I

PTI A₁

Issued: 8/28/2003

Emissions Unit ID: K009

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K011 - Adhesive roller coater (B94)- miscellaneous metal parts coating operation (modification to PTI 03-10256, issued 3/1/01). Modification to increase synthetic minor group limit from 160 TPY OC to 255 TPY OC.	OAC rule 3745-31-05(A)(3)	7.0 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents (see Section A.I.2.b.)
	OAC rule 3745-31-05(D)	1.47 lbs OC/hour, 6.44 tons OC/year (is inclusive of clean-up materials)
	OAC rule 3745-21-09(U)(2)(f)	255 tons OC per rolling, 365-day period, from all the emission units identified in A.I.2.a. (see Section A.I.2.a.) see Section A.I.2.b.

2. Additional Terms and Conditions

- 2.a The permittee has requested a federally enforceable limitation of 255 tons OC per rolling, 365-day period from Anti-Vibration Adhesive Coating operations, emissions units: K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048 combined for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.

Rolling limits for Anti-Vibration Adhesive Coating operations were established in Permit to Install (PTI) 03-10256 which was issued on March 1, 2001, and as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable

Emissions Unit ID: K011

restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability OC limitations effectively restrict VOC emissions.

- 2.b** PTI #03-10256 was issued on March 1, 2001, with terms and conditions that defined best available technology as 7.0 lbs VOC/gallon of coating, excluding water and exempt solvents, in accordance with the requirements of OAC rule 3745-21-09(U)(2)(f).

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. In order to demonstrate compliance with the 255 tons per rolling 365-day period and the 7.0 lbs VOC/gallon of coating, excluding water and exempt solvents, the permittee shall collect and record the following each day for emission units: K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048 combined.
 - a. the name and identification number of each coating and cleanup material;
 - b. the OC content of each coating and cleanup material, as applied;
 - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gallon, [The VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{\text{VOC},2}$];
 - d. the number of gallons of each coating and cleanup material employed;
 - e. the OC emission rates from each coating and cleanup material employed (b x d); and
 - f. the total OC emission rate from all coatings and cleanup material employed, (summation of e); and
 - g. the rolling 365-day summation of the total OC emission rate.

IV. Reporting Requirements

1. In accordance with the General Terms and Conditions of this permit, the permittee shall submit deviation (excursion) reports for emissions unit K011 which identify exceedances of any of the following:
 - a. any exceedances of the volatile organic compound content restrictions in section A.I.2.b. of this permit; and
 - b. any exceedances of the 255 tons OC per rolling, 365-day period for Anti-Vibration

Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048.

V. Testing Requirements

1. Compliance with the emission limitations in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. **Emission Limitation**
1.47 lbs OC/hour

Applicable Compliance Method

The hourly OC emission limitation is based on the emission units potential to emit.* Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit is based on a two-part coating system of primer and topcoat, including cleanup materials, with a maximum usage of 0.21 gal/hr at a maximum OC content of 7.00 lbs/gallon.

- b. **Emission Limitation**
6.44 tons OC/year

Applicable Compliance Method

The annual emission limitation for this emission unit was based on the emission unit's potential to emit.* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was based on multiplying the maximum lbs OC/hour emitted by 8760 hours/year and dividing by 2000 lbs/ton.

- c. **Emission Limitation**
255 tons OC per rolling 365-day period from all Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046 and K048 combined.

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.2. of this permit.

- d. **Emission Limitation**
7.0 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.2 of this permit. Any determination of VOC content (VOC means all volatile organic compounds that in a coating material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K011 - Adhesive roller coater (B94)- miscellaneous metal parts coating operation (modification to PTI 03-10256, issued 3/1/01). Modification to increase synthetic minor group limit from 160 TPY OC to 255 TPY OC.	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
K013 - Manual adhesive spray #3 (B75) miscellaneous metal parts coating operation (administrative modification to PTI 03-10256, issued 3/1/01). Modification to increase hourly and annual emission limitations and synthetic minor group limit from 160 TPY OC to 255 TPY OC.	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-09(U)(2)(f)
		OAC rule 3745-17-11(B)
		OAC rule 3745-17-07(A)
	OAC rule 3745-31-05(D)	

Applicable Emissions
Limitations/Control
Measures

Use of water wash or dry
filtration system

7.0 lbs volatile organic
compounds (VOC)/gallon of
coating, excluding water and
exempt solvents (see Section
A.I.2.b.)

6.79 lbs organic compounds
(OC)/hour, 29.74 tons
OC/year (is inclusive of
clean-up materials)

0.10 lb particulate emissions
(PE)/hour, 0.44 ton PE/year

Visible PE shall not exceed
0% opacity, as a six-minute
average

255 tons OC per rolling,
365-day period, from all the
emission units identified in
A.I.2.a. (see Section
A.I.2.a.)

see Section A.I.2.b.

see Section A.I.2.c.

see Section A.I.2.c.

2. Additional Terms and Conditions

2.a The permittee has requested a federally enforceable limitation of 255 tons OC per rolling, 365-day period from Anti-Vibration Adhesive Coating operations, emissions units: K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048 combined for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.

Rolling limits for Anti-Vibration Adhesive Coating operations were established in Permit

to Install (PTI) 03-10256 which was issued on March 1, 2001, and as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability OC limitations effectively restrict VOC emissions.

- 2.b** PTI #03-10256 was issued on March 1, 2001, with terms and conditions that defined best available technology as 7.0 lbs VOC/gallon of coating, excluding water and exempt solvents, in accordance with the requirements of OAC rule 3745-21-09(U)(2)(f).
- 2.c** The emission limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d** For the purposes of federal enforceability OC limitations effectively restrict VOC emissions.

II. Operational Restrictions

- 1. The permittee shall operate the water wash or dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
- 2. In order to demonstrate compliance with the 255 tons per rolling 365-day period and the 7.0 lbs VOC/gallon of coating, excluding water and exempt solvents, the permittee shall collect and record the following each day for emission units: K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048 combined.
 - a. the name and identification number of each coating and cleanup material;
 - b. the OC content of each coating and cleanup material, as applied;
 - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gallon, [The VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,2}$];
 - d. the number of gallons of each coating and cleanup material employed;

- e. the OC emission rates from each coating and cleanup material employed (b x d); and
- f. the total OC emission rate from all coatings and cleanup material employed, (summation of e); and
- g. the rolling 365-day summation of the total OC emission rate.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit deviation (excursion) reports for emissions unit K013 which identify exceedances of any of the following:
 - a. any exceedances of the volatile organic compound content restrictions in section A.I.2.b. of this permit; and
 - b. any exceedances of the 255 tons OC per rolling, 365-day period for Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048.

V. Testing Requirements

1. Compliance with the emission limitations in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. **Emission Limitation**
6.79 lbs OC/hour

Applicable Compliance Method

The hourly OC emission limitation is based on the emission units potential to emit.* Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit is based on a two-part coating system of primer and topcoat, including cleanup materials, with a maximum usage of 0.97 gallon/hour at a maximum OC content of 7.0 lbs/gallon.

- b. **Emission Limitation**
 29.74 tons OC/year

Applicable Compliance Method

The annual emission limitation for this emission unit was based on the emission unit's potential to emit.* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was established by multiplying the lbs OC/hour limitation by the maximum operating hours, 8760 hours/year and dividing by 2000 lbs/ton.

- c. **Emission Limitation**
 0.10 lb PE/hour, 0.44 ton PE/year

Applicable Compliance Method

Compliance with the PE limitations shall be determined in accordance with the following:

The permittee may calculate the actual PE rates utilizing the following equation:

$$E = (\text{maximum coating solids usage rate in lbs/hr}) \times (1-TE) \times (1-CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

TE = Transfer Efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = Control Efficiency of the control equipment

Annual emissions shall be calculated based on multiplying E by the annual operating schedule for the emissions unit and dividing by 2000 lbs per ton.

If required, compliance with the PE limitations shall be based on stack testing in accordance with 40 CFR Part 60, Appendix A- Test Methods 1-5.

- d. **Emission Limitation**
 Visible PE shall not exceed 0% opacity, as a six-minute average

Applicable Compliance Method

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

e. **Emission Limitation**

255 tons OC per rolling 365-day period from all Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046 and K048 combined.

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.2. of this permit.

f. **Emission Limitation**

7.0 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.2 of this permit. Any determination of VOC content (VOC means all volatile organic compounds that in a coating material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K013 - Manual adhesive spray #3 (B75) miscellaneous metal parts coating operation (modification to PTI 03-10256, issued 3/1/01). Modification to increase hourly and annual emission limitations and synthetic minor group limit from 160 TPY OC to 255 TPY OC.	See below	See below

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions unit K013 and K016 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application

Emissions Unit ID: K013

and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: methyl isobutyl ketone
 TLV (mg/m³): 204.82
 Maximum Hourly Emission Rate (lbs/hr): 4.72*
 Predicted 1-Hour Maximum Ground-Level
 Concentration (ug/m³): 876.6
 MAGLC (ug/m³): 4877

Pollutant: toluene
 TLV (mg/m³): 188.40
 Maximum Hourly Emission Rate (lbs/hr): 7.98*
 Predicted 1-Hour Maximum Ground-Level
 Concentration (ug/m³): 1501.0
 MAGLC (ug/m³): 4486

*Combined emission rates for K013 and K016.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification

definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K016 - Manual adhesive spray 4 (B165) miscellaneous metal parts coating operation (modification to PTI 03-10256, issued 3/1/01). Modification to increase hourly and annual emission limitations and synthetic minor group limit from 160 TPY OC to 255 TPY OC.	OAC rule 3745-31-05(A)(3)	Use of water wash or dry filtration system 7.0 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents (see Section A.I.2.b.) 6.79 lbs organic compounds (OC)/hour, 29.74 tons OC/year (is inclusive of clean-up materials) 0.10 lb particulate emissions (PE)/hour, 0.44 ton PE/year Visible PE shall not exceed 0% opacity, as a six-minute average
	OAC rule 3745-31-05(D)	255 tons OC per rolling, 365-day period, from all the emission units identified in A.I.2.a. (see Section A.I.2.a.)
	OAC rule 3745-21-09(U)(2)(f)	see Section A.I.2.b.
	OAC rule 3745-17-11(B)	see Section A.I.2.c.
	OAC rule 3745-17-07(A)	see Section A.I.2.c.

2. Additional Terms and Conditions

- 2.a The permittee has requested a federally enforceable limitation of 255 tons OC per rolling, 365-day period from Anti-Vibration Adhesive Coating operations, emissions units: K004,

K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048 combined for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.

Rolling limits for Anti-Vibration Adhesive Coating operations were established in Permit to Install (PTI) 03-10256 which was issued on March 1, 2001, and as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability OC limitations effectively restrict VOC emissions.

- 2.b** PTI #03-10256 was issued on March 1, 2001, with terms and conditions that defined best available technology as 7.0 lbs VOC/gallon of coating, excluding water and exempt solvents, in accordance with the requirements of OAC rule 3745-21-09(U)(2)(f).
- 2.c** The emission limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d** For the purposes of federal enforceability OC limitations effectively restrict VOC emissions.

II. Operational Restrictions

- 1. The permittee shall operate the water wash or dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
- 2. In order to demonstrate compliance with the 255 tons per rolling 365-day period and the 7.0 lbs VOC/gallon of coating, excluding water and exempt solvents, the permittee shall collect and record the following each day for emission units: K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048 combined.
 - a. the name and identification number of each coating and cleanup material;
 - b. the OC content of each coating and cleanup material, as applied;
 - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in

Emissions Unit ID: K016

lbs/gallon, [The VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,2}$];

- d. the number of gallons of each coating and cleanup material employed;
- e. the OC emission rates from each coating and cleanup material employed (b x d); and
- f. the total OC emission rate from all coatings and cleanup material employed, (summation of e); and
- g. the rolling 365-day summation of the total OC emission rate.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit deviation (excursion) reports for emissions unit K016 which identify exceedances of any of the following:
 - a. any exceedances of the volatile organic compound content restrictions in section A.I.2.b. of this permit; and
 - b. any exceedances of the 255 tons OC per rolling, 365-day period for Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048.

V. Testing Requirements

1. Compliance with the emission limitations in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. **Emission Limitation**
6.79 lbs OC/hour

Applicable Compliance Method

The hourly OC emission limitation is based on the emission units potential to emit.*
 Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit is based on a two-part coating system of primer and topcoat, including cleanup materials, with a maximum usage of 0.97 gallon/hour at a maximum OC content of 7.0 lbs/gallon.

- b. **Emission Limitation**
29.74 tons OC/year

Applicable Compliance Method

The annual emission limitation for this emission unit was based on the emission unit's potential to emit.* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was established by multiplying the lbs OC/hour limitation by the maximum operating hours, 8760 hours/year and dividing by 2000 lbs/ton.

- c. **Emission Limitation**
0.10 lb PE/hour, 0.44 ton PE/year

Applicable Compliance Method

Compliance with the PE limitations shall be determined in accordance with the following:

The permittee may calculate the actual PE rates utilizing the following equation:

$$E = (\text{maximum coating solids usage rate in lbs/hr}) \times (1-TE) \times (1-CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

TE = Transfer Efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = Control Efficiency of the control equipment

Annual emissions shall be calculated based on multiplying E by the annual operating schedule for the emissions unit and dividing by 2000 lbs per ton.

If required, compliance with the PE limitations shall be based on stack testing in

accordance with 40 CFR Part 60, Appendix A- Test Methods 1-5.

d. **Emission Limitation**

Visible PE shall not exceed 0% opacity, as a six-minute average

Applicable Compliance Method

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

e. **Emission Limitation**

255 tons OC per rolling 365-day period from all Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046 and K048 combined.

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.2. of this permit.

f. **Emission Limitation**

7.0 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.2 of this permit. Any determination of VOC content (VOC means all volatile organic compounds that in a coating material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K016 - Manual adhesive spray 4 (B165) miscellaneous metal parts coating operation (modification to PTI 03-10256, issued 3/1/01). Modification to increase hourly and annual emission limitations and synthetic minor group limit from 160 TPY OC to 255 TPY OC.	See below	See below

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

- The permit to install for emissions unit K013 and K016 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: methyl isobutyl ketone

TLV (mg/m³): 204.82
Maximum Hourly Emission Rate (lbs/hr): 4.72*
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 876.6
MAGLC (ug/m³): 4877

Pollutant: toluene
TLV (mg/m³): 188.40
Maximum Hourly Emission Rate (lbs/hr): 7.98*
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 1501.0
MAGLC (ug/m³): 4486

*Combined emission rates for K013 and K016.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification

Emissions Unit ID: K016

definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	OAC rule 3745-17-07(A)
K017 - Auto adhesive spray #3 (B123) miscellaneous metal parts coating operation (modification to PTI 03-10256, issued 3/1/01). Modification to increase synthetic minor group limit from 160 TPY OC to 255 TPY OC.	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-31-05(D)	
	OAC rule 3745-21-09(U)(2)(f)	
	OAC rule 3745-17-11(B)	

Applicable Emissions
Limitations/Control
Measures

Use of water wash or dry
filtration system

7.0 lbs volatile organic
compounds (VOC)/gallon of
coating, excluding water and
exempt solvents (see Section
A.I.2.b.)

7.07 lbs organic compounds
(OC)/hour, 30.97 tons
OC/year (is inclusive of
clean-up materials)

0.11 lb particulate emissions
(PE)/hour, 0.48 ton PE/year

Visible PE shall not exceed
0% opacity, as a six-minute
average

255 tons OC per rolling,
365-day period, from all the
emission units identified in
A.I.2.a. (see Section
A.I.2.a.)

see Section A.I.2.b.

see Section A.I.2.c.

see Section A.I.2.c.

2. Additional Terms and Conditions

2.a The permittee has requested a federally enforceable limitation of 255 tons OC per rolling, 365-day period from Anti-Vibration Adhesive Coating operations, emissions units: K004,

K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048 combined for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.

Rolling limits for Anti-Vibration Adhesive Coating operations were established in Permit to Install (PTI) 03-10256 which was issued on March 1, 2001, and as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability OC limitations effectively restrict VOC emissions.

- 2.b** PTI #03-10256 was issued on March 1, 2001, with terms and conditions that defined best available technology as 7.0 lbs VOC/gallon of coating, excluding water and exempt solvents, in accordance with the requirements of OAC rule 3745-21-09(U)(2)(f).
- 2.c** The emission limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d** For the purposes of federal enforceability OC limitations effectively restrict VOC emissions.

II. Operational Restrictions

- 1. The permittee shall operate the water wash or dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
- 2. In order to demonstrate compliance with the 255 tons per rolling 365-day period and the 7.0 lbs VOC/gallon of coating, excluding water and exempt solvents, the permittee shall collect and record the following each day for emission units: K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048 combined.
 - a. the name and identification number of each coating and cleanup material;
 - b. the OC content of each coating and cleanup material, as applied;
 - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in

Emissions Unit ID: K017

lbs/gallon, [The VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,2}$];

- d. the number of gallons of each coating and cleanup material employed;
- e. the OC emission rates from each coating and cleanup material employed (b x d); and
- f. the total OC emission rate from all coatings and cleanup material employed, (summation of e); and
- g. the rolling 365-day summation of the total OC emission rate.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit deviation (excursion) reports for emissions unit K017 which identify exceedances of any of the following:
 - a. any exceedances of the volatile organic compound content restrictions in section A.I.2.b. of this permit; and
 - b. any exceedances of the 255 tons OC per rolling, 365-day period for Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048.

V. Testing Requirements

1. Compliance with the emission limitations in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. **Emission Limitation**
7.07 lbs OC/hour

Applicable Compliance Method

The hourly OC emission limitation is based on the emission units potential to emit.*
 Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit is based on a two-part coating system of primer and topcoat, including cleanup materials, with a maximum usage of 1.01 gallon/hour at a maximum OC content of 7.0 lbs/gallon.

- b. **Emission Limitation**
30.97 tons OC/year

Applicable Compliance Method

The annual emission limitation for this emission unit was based on the emission unit's potential to emit.* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was established by multiplying the lbs OC/hour limitation by the maximum operating hours, 8760 hours/year and dividing by 2000 lbs/ton.

- c. **Emission Limitation**
0.11 lb PE/hour, 0.48 ton PE/year

Applicable Compliance Method

Compliance with the PE limitations shall be determined in accordance with the following:

The permittee may calculate the actual PE rates utilizing the following equation:

$$E = (\text{maximum coating solids usage rate in lbs/hr}) \times (1-TE) \times (1-CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

TE = Transfer Efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = Control Efficiency of the control equipment

Annual emissions shall be calculated based on multiplying E by the annual operating schedule for the emissions unit and dividing by 2000 lbs per ton.

If required, compliance with the PE limitations shall be based on stack testing in

Emissions Unit ID: K017

accordance with 40 CFR Part 60, Appendix A- Test Methods 1-5.

d. **Emission Limitation**

Visible PE shall not exceed 0% opacity, as a six-minute average

Applicable Compliance Method

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

e. **Emission Limitation**

255 tons OC per rolling 365-day period from all Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046 and K048 combined.

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.2. of this permit.

f. **Emission Limitation**

7.0 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.2 of this permit. Any determination of VOC content (VOC means all volatile organic compounds that in a coating material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K017 - Auto adhesive spray #3 (B123) miscellaneous metal parts coating operation (modification to PTI 03-10256, issued 3/1/01). Modification to increase synthetic minor group limit from 160 TPY OC to 255 TPY OC.	See below	See below

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit K017 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application, the SCREEN 3.0 and Industrial Source Complex - Short Term III models. The predicted 1-hour maximum ground-level concentration from the use of the models was compared to the Maximum

Acceptable Ground-Level Concentration (MAGLC). This emissions unit was previously modeled in PTI #03-10256. The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Tetrachloroethylene

TLV (ug/m³): 170

Maximum Hourly Emission Rate (lbs/hr): 2.99

Predicted 1 Hour Maximum Ground-Level Concentration at or beyond the Fenceline (ug/m³): 2225*

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 4048

Pollutant: Xylene

TLV (ug/m³): 434

Maximum Hourly Emission Rate (lbs/hr): 13.12

Predicted 1 Hour Maximum Ground-Level Concentration at or beyond the Fenceline (ug/m³): 9758*

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 10333

Pollutant: Ethyl Benzene**

TLV (ug/m³): 434

Maximum Hourly Emission Rate (lbs/hr): 4.18

Predicted 1 Hour Maximum Ground-Level Concentration at or beyond the Fenceline (ug/m³): 3353*

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 10333

Pollutant: Toluene

TLV (ug/m³): 188,400

Maximum Hourly Emission Rate (lbs/hr): 16.46

Predicted 1 Hour Maximum Ground-Level Concentration at or beyond the Fenceline (ug/m³): 1418***

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 4486

Pollutant: Methyl Isobutyl Ketone

TLV (ug/m³): 205,000

Maximum Hourly Emission Rate (lbs/hr): 23.87

Predicted 1 Hour Maximum Ground-Level Concentration at or beyond the Fenceline (ug/m³): 2220***

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 4881

Emissions Unit ID: K017

* Based on Screen 3 model

** The following additional conservative assumptions were made in the Screen modeling:

The remaining emissions of toxic compounds excluding Tetrachloroethylene, Toluene, Methyl Isobutyl Ketone, and Xylene in the coatings or cleaning materials were assumed to be Ethyl Benzene which has the lowest TLV of the remaining toxic compounds.

*** Based on ISCST3 model

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

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

IV. Reporting Requirements

None

V. Testing Requirements

None

82

DTR Industries Inc

PTI Application: 02 12020

Issued

Facility ID: 0302000166

Emissions Unit ID: K017

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	OAC rule 3745-17-07(A)
K018 - Auto adhesive spray #4 (B124) miscellaneous metal parts coating operation (modification to PTI 03-10256, issued 3/1/01). Modification to increase synthetic minor group limit from 160 TPY OC to 255 TPY OC.	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-31-05(D)	
	OAC rule 3745-21-09(U)(2)(f)	
	OAC rule 3745-17-11(B)	

Applicable Emissions
Limitations/Control
Measures

Use of water wash or dry
filtration system

7.0 lbs volatile organic
compounds (VOC)/gallon of
coating, excluding water and
exempt solvents (see Section
A.I.2.b.)

7.07 lbs organic compounds
(OC)/hour, 30.97 tons
OC/year (is inclusive of
clean-up materials)

0.10 lb particulate emissions
(PE)/hour, 0.44 ton PE/year

Visible PE shall not exceed
0% opacity, as a six-minute
average

255 tons OC per rolling,
365-day period, from all the
emission units identified in
A.I.2.a. (see Section
A.I.2.a.)

see Section A.I.2.b.

see Section A.I.2.c.

see Section A.I.2.c.

2. Additional Terms and Conditions

- 2.a** The permittee has requested a federally enforceable limitation of 255 tons OC per rolling, 365-day period from Anti-Vibration Adhesive Coating operations, emissions units: K004,

K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048 combined for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.

Rolling limits for Anti-Vibration Adhesive Coating operations were established in Permit to Install (PTI) 03-10256 which was issued on March 1, 2001, and as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability OC limitations effectively restrict VOC emissions.

- 2.b** PTI #03-10256 was issued on March 1, 2001, with terms and conditions that defined best available technology as 7.0 lbs VOC/gallon of coating, excluding water and exempt solvents, in accordance with the requirements of OAC rule 3745-21-09(U)(2)(f).
- 2.c** The emission limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d** For the purposes of federal enforceability OC limitations effectively restrict VOC emissions.

II. Operational Restrictions

- 1. The permittee shall operate the water wash or dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
- 2. In order to demonstrate compliance with the 255 tons per rolling 365-day period and the 7.0 lbs VOC/gallon of coating, excluding water and exempt solvents, the permittee shall collect and record the following each day for emission units: K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048 combined.
 - a. the name and identification number of each coating and cleanup material;
 - b. the OC content of each coating and cleanup material, as applied;
 - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in

lbs/gallon, [The VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,2}$];

- d. the number of gallons of each coating and cleanup material employed;
- e. the OC emission rates from each coating and cleanup material employed (b x d); and
- f. the total OC emission rate from all coatings and cleanup material employed, (summation of e); and
- g. the rolling 365-day summation of the total OC emission rate.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit deviation (excursion) reports for emissions unit K018 which identify exceedances of any of the following:
 - a. any exceedances of the volatile organic compound content restrictions in section A.I.2.b. of this permit; and
 - b. any exceedances of the 255 tons OC per rolling, 365-day period for Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048.

V. Testing Requirements

1. Compliance with the emission limitations in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. **Emission Limitation**
7.07 lbs OC/hour

Applicable Compliance Method

The hourly OC emission limitation is based on the emission units potential to emit.* Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit is based on a two-part coating system of primer and topcoat, including cleanup materials, with a maximum usage of 1.01 gallon/hour at a maximum OC content of 7.0 lbs/gallon.

b. **Emission Limitation**

30.97 tons OC/year

Applicable Compliance Method

The annual emission limitation for this emission unit was based on the emission unit's potential to emit.* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was established by multiplying the lbs OC/hour limitation by the maximum operating hours, 8760 hours/year and dividing by 2000 lbs/ton.

c. **Emission Limitation**

0.10 lb PE/hour, 0.44 ton PE/year

Applicable Compliance Method

Compliance with the PE limitations shall be determined in accordance with the following:

The permittee may calculate the actual PE rates utilizing the following equation:

$$E = (\text{maximum coating solids usage rate in lbs/hr}) \times (1-TE) \times (1-CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

TE = Transfer Efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = Control Efficiency of the control equipment

Annual emissions shall be calculated based on multiplying E by the annual operating schedule for the emissions unit and dividing by 2000 lbs per ton.

If required, compliance with the PE limitations shall be based on stack testing in

accordance with 40 CFR Part 60, Appendix A- Test Methods 1-5.

d. **Emission Limitation**

Visible PE shall not exceed 0% opacity, as a six-minute average

Applicable Compliance Method

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

e. **Emission Limitation**

255 tons OC per rolling 365-day period from all Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046 and K048 combined.

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.2. of this permit.

f. **Emission Limitation**

7.0 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.2 of this permit. Any determination of VOC content (VOC means all volatile organic compounds that in a coating material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K018 - Auto adhesive spray #4 (B124) miscellaneous metal parts coating operation (modification to PTI 03-10256, issued 3/1/01). Modification to increase synthetic minor group limit from 160 TPY OC to 255 TPY OC.	See below	See below

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

- 1. The permit to install for this emissions unit K018 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application, the SCREEN 3.0 and Industrial Source Complex - Short Term III models. The predicted 1-hour maximum ground-level concentration from the use of the models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). This emissions unit was previously modeled in PTI #03-10256. The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Tetrachloroethylene
TLV (ug/m3): 170

Issued: 8/28/2003

Maximum Hourly Emission Rate (lbs/hr): 2.99
Predicted 1 Hour Maximum Ground-Level Concentration at or beyond
the Fenceline (ug/m³): 2225*
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 4048

Pollutant: Xylene
TLV (ug/m³): 434
Maximum Hourly Emission Rate (lbs/hr): 13.12
Predicted 1 Hour Maximum Ground-Level Concentration at or beyond
the Fenceline (ug/m³): 9758*
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 10333

Pollutant: Ethyl Benzene**
TLV (ug/m³): 434
Maximum Hourly Emission Rate (lbs/hr): 4.18
Predicted 1 Hour Maximum Ground-Level Concentration at or beyond
the Fenceline (ug/m³): 3353*
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 10333

Pollutant: Toluene
TLV (ug/m³): 188,000
Maximum Hourly Emission Rate (lbs/hr): 16.46
Predicted 1 Hour Maximum Ground-Level Concentration at or beyond
the Fenceline (ug/m³): 1418***
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 4476

Pollutant: Methyl Isobutyl Ketone
TLV (ug/m³): 205,000
Maximum Hourly Emission Rate (lbs/hr): 23.87

Predicted 1 Hour Maximum Ground-Level Concentration at or beyond
the Fenceline (ug/m³): 2220***
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 4881

* Based on Screen 3 model

* * The following additional conservative assumptions were made in the Screen modeling:

The remaining emissions of toxic compounds excluding Tetrachloroethylene, Toluene, Methyl Isobutyl Ketone, and Xylene in the coatings or cleaning materials were assumed

to be Ethyl Benzene which has the lowest TLV of the remaining toxic compounds.

*** Based on ISCST3 model

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

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

IV. Reporting Requirements

None

V. Testing Requirements

None

93

DTR I

PTI A₁

Issued: 8/28/2003

Emissions Unit ID: K018

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K019 - Paint spray machine No.3 (B139-1) Modification to PTI # 03-13807 issued on 12/05/02 to increase the synthetic minor group limit from 8 TPY OC to 18 TPY OC.	OAC rule 3745-31-05 (A)(3)	Use of water wash or dry filtration system 0.63 lb organic compounds (OC)/hr, 2.76 tons OC/yr 0.13 lb particulate emissions (PE)/hr, 0.57 tons PE/yr 0% opacity as a six-minute average See A.I.2.a.
	OAC rule 3745-17-07(A)	See A.I.2.b.
	OAC rule 3745-17-11(B)	See A.I.2.b.
	OAC rule 3745-21-09(U)(1)(c)	3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, for an extreme performance coating.
	OAC rule 3745-31-05(D)	18.0 tons OC per rolling, 365-day period, from all the emission units identified in A.I.2.c. (see Section A.I.2.c)

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with OAC rule 3745-21-09(U)(1)(c) and OAC rule 3745-31-05(D).
- 2.b The emission limit specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.c The permittee has requested a federally enforceable limitation of 18 tons OC per rolling, 365-day period from Anti-Vibration Water-Borne Painting operations, emissions units: K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.

Rolling limits for Anti-Vibration Adhesive Coating operations were established in Permit to Install (PTI) 03-13807 which was issued on December 5, 2002, and as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability OC limitations effectively restrict VOC emissions.

II. Operational Restrictions

- 1. The permittee shall operate the water wash system or the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain daily records that document any time periods when the water wash system or the dry filtration system was not in service when the emissions unit was in operation.
- 2. In order to demonstrate compliance with the 18 tons per rolling 365-day period and the 3.5 lbs VOC/gallon of coating, excluding water and exempt solvents, the permittee shall collect and record the following each day for emission units: K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined.
 - a. the name and identification number of each coating, employed;
 - b. the OC content of each coating, in lbs/gallon, as applied;
 - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gallon, [The VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{voc,2}$];

- d. the number of gallons of each coating employed;
- e. the OC emission rates from each coating employed (b x d) in lbs; and
- f. the total OC emission rate from all coatings and cleanup material employed, in lbs (summation of e); and
- g. the rolling 365-day summation of the total OC emission rate, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the water wash system or the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.
2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit deviation (excursion) reports for emissions unit K019 which identify exceedances of any of the following:
 - a. any exceedances of the 3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, content restriction; and
 - b. any exceedances of the 18 tons OC per rolling, 365-day period for Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
 - a. **Emission Limitation**
0.63 lb OC/hr and 2.76 TPY OC

Applicable Compliance Method
The hourly OC emission limitation is based on the emissions unit's potential to emit*. Therefore, no recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance. The TPY limitation was developed by multiplying the lb/hr limitation by a maximum operating schedule of 8760 hrs per year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

*The potential to emit for this emissions unit was based on a maximum hourly gallon usage of 0.62 gallons per hour and a maximum OC content of 1.01 lbs per gallon.
 - b. **Emission Limitation**
0.13 lb PE/hr and 0.57 TPY PE

Applicable Compliance Method

The permittee shall demonstrate compliance with this limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate in lbs/hr}) \times (1 - TE)(1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

TE = Transfer Efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = Control Efficiency of the control equipment

Annual emissions shall be calculated based on multiplying E by the annual operating schedule for the emissions unit and dividing by 2000 lbs per ton.

If required, compliance with the PE limitations shall be based on stack testing in accordance with 40 CFR Part 60, Appendix A- Test Methods 1-5.

- c. **Emission Limitation**
18 tons OC per rolling 365-day period from all Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined.

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.2 of this permit.

- d. **Emission Limitation**
0% opacity as a six minute average

Applicable Compliance Method

If required, compliance with the visible PE limitation shall be determined in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

- e. **Emission Limitation**
3.5 lbs VOC per gallon of coating, excluding water and exempt solvent

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.2 of this permit. Any determination of VOC content (VOC means all volatile organic compounds that in a coating material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K019 - Paint spray machine No. 3 (B139-1) Modification to PTI # 03-13807 issued on 12/05/02 to increase the synthetic minor group limit from 8 TPY OC to 18 TPY OC.	See below	See below

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit K019 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application, the SCREEN 3.0 and Industrial Source Complex - Short Term III models. The predicted 1-hour maximum ground-level concentration from the use of the models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Triethylamine
TLV (mg/m³): 4.21
Maximum Hourly Emission Rate (lbs/hr): 0.95
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 87.37 *
MAGLC (ug/m³): 100.24

Pollutant: 2-Butoxyethanol
TLV (mg/m³): 98.2
Maximum Hourly Emission Rate (lbs/hr): 4.40
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 2075 **
MAGLC (ug/m³): 2338

* Based on ISCST3 model

** Based on Screen 3 model

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

Emissions Unit ID: K019

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

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K023 - Paint spray machine No. 4 (B247-1) Modification to PTI # 03-13807 issued on 12/05/02 to increase the synthetic minor group limit from 8 TPY OC to 18 TPY OC.	OAC rule 3745-31-05 (A)(3)	Use of water wash or dry filtration system 0.63 lb organic compounds (OC)/hr, 2.76 tons OC/yr 0.13 lb particulate emissions (PE)/hr, 0.57 tons PE/yr 0% opacity as a six-minute average
	OAC rule 3745-17-07(A)	See A.I.2.a.
	OAC rule 3745-17-11(B)	See A.I.2.b.
	OAC rule 3745-21-09(U)(1)(c)	See A.I.2.b. 3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, for an extreme performance coating.
	OAC rule 3745-31-05(D)	18.0 tons OC per rolling, 365-day period, from all the emission units identified in A.I.2.c. (see Section A.I.2.c)

2. Additional Terms and Conditions

Emissions Unit ID: K023

- 2.a The requirements of this rule also include compliance with OAC rule 3745-21-09(U)(1)(c) and OAC rule 3745-31-05(D).
- 2.b The emission limit specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.c The permittee has requested a federally enforceable limitation of 18 tons OC per rolling, 365-day period from Anti-Vibration Water-Borne Painting operations, emissions units: K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.

Rolling limits for Anti-Vibration Adhesive Coating operations were established in Permit to Install (PTI) 03-13807 which was issued on December 5, 2002, and as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability OC limitations effectively restrict VOC emissions.

II. Operational Restrictions

- 1. The permittee shall operate the water wash system or the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain daily records that document any time periods when the water wash system or the dry filtration system was not in service when the emissions unit was in operation.
- 2. In order to demonstrate compliance with the 18 tons per rolling 365-day period and the 3.5 lbs VOC/gallon of coating, excluding water and exempt solvents, the permittee shall collect and record the following each day for emission units: K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined.
 - a. the name and identification number of each coating, employed;
 - b. the OC content of each coating, in lbs/gallon, as applied;
 - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gallon, [The VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,2}$];
 - d. the number of gallons of each coating employed;
 - e. the OC emission rates from each coating employed (b x d) in lbs; and
 - f. the total OC emission rate from all coatings and cleanup material employed, in lbs

105

DTR I

PTI A₁

Issued: 8/28/2003

Emissions Unit ID: K023

(summation of e); and

- g. the rolling 365-day summation of the total OC emission rate, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the water wash system or the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.
2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit deviation (excursion) reports for emissions unit K023 which identify exceedances of any of the following:
 - a. any exceedances of the 3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, content restriction; and
 - b. any exceedances of the 18 tons OC per rolling, 365-day period for Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
 - a. **Emission Limitation**
0.63 lb OC/hr and 2.76 TPY OC

Applicable Compliance Method
The hourly OC emission limitation is based on the emissions unit's potential to emit*. Therefore, no recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance. The TPY limitation was developed by multiplying the lb/hr limitation by a maximum operating schedule of 8760 hrs per year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

*The potential to emit for this emissions unit was based on a maximum hourly gallon usage of 0.62 gallons per hour and a maximum OC content of 1.01 lbs per gallon.
 - b. **Emission Limitation**
0.13 lb PE/hr and 0.57 TPY PE

Applicable Compliance Method

The permittee shall demonstrate compliance with this limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate in lbs/hr}) \times (1 - TE)(1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

TE = Transfer Efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = Control Efficiency of the control equipment

Annual emissions shall be calculated based on multiplying E by the annual operating schedule for the emissions unit and dividing by 2000 lbs per ton.

If required, compliance with the PE limitations shall be based on stack testing in accordance with 40 CFR Part 60, Appendix A- Test Methods 1-5.

c. **Emission Limitation**

18 tons OC per rolling 365-day period from all Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined.

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.2 of this permit.

d. **Emission Limitation**

0% opacity as a six minute average

Applicable Compliance Method

If required, compliance with the visible PE limitation shall be determined in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

e. **Emission Limitation**

3.5 lbs VOC per gallon of coating, excluding water and exempt solvent

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.2 of this permit. Any determination of VOC content (VOC means all volatile organic compounds that in a coating material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids contents, or density of coating material shall be based

on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K023 - Paint spray machine No.4 (B247-1) Modification to PTI # 03-13807 issued on 12/05/02 to increase the synthetic minor group limit from 8 TPY OC to 18 TPY OC.	See below	See below

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit K023 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application, the SCREEN 3.0 and Industrial Source Complex - Short Term III models. The predicted 1-hour maximum ground-level concentration from the use of the models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Triethylamine
TLV (mg/m3): 4.21
Maximum Hourly Emission Rate (lbs/hr): 0.95
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 87.37 *
MAGLC (ug/m3): 100.24

Pollutant: 2-Butoxyethanol
TLV (mg/m3): 98.2
Maximum Hourly Emission Rate (lbs/hr): 4.40
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 2075 **
MAGLC (ug/m3): 2338

- * Based on ISCST3 model
** Based on Screen 3 model

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

Emissions Unit ID: K023

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K026 - Paint spray machine No. 5 (B314-1) Modification to PTI # 03-13807 issued on 12/05/02 to increase the synthetic minor group limit from 8 TPY OC to 18 TPY OC.	OAC rule 3745-31-05 (A)(3)	Use of water wash or dry filtration system 0.63 lb organic compounds (OC)/hr, 2.76 tons OC/yr 0.13 lb particulate emissions (PE)/hr, 0.57 tons PE/yr 0% opacity as a six-minute average See A.I.2.a.
	OAC rule 3745-17-07(A)	See A.I.2.b.
	OAC rule 3745-17-11(B)	See A.I.2.b.
	OAC rule 3745-21-09(U)(1)(c)	3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, for an extreme performance coating.
	OAC rule 3745-31-05(D)	18.0 tons OC per rolling, 365-day period, from all the emission units identified in A.I.2.c. (see Section A.I.2.c)

2. Additional Terms and Conditions

Emissions Unit ID: K026

- 2.a The requirements of this rule also include compliance with OAC rule 3745-21-09(U)(1)(c) and OAC rule 3745-31-05(D).
- 2.b The emission limit specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.c The permittee has requested a federally enforceable limitation of 18 tons OC per rolling, 365-day period from Anti-Vibration Water-Borne Painting operations, emissions units: K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.

Rolling limits for Anti-Vibration Adhesive Coating operations were established in Permit to Install (PTI) 03-13807 which was issued on December 5, 2002, and as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability OC limitations effectively restrict VOC emissions.

II. Operational Restrictions

- 1. The permittee shall operate the water wash system or the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain daily records that document any time periods when the water wash system or the dry filtration system was not in service when the emissions unit was in operation.
- 2. In order to demonstrate compliance with the 18 tons per rolling 365-day period and the 3.5 lbs VOC/gallon of coating, excluding water and exempt solvents, the permittee shall collect and record the following each day for emission units: K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined.
 - a. the name and identification number of each coating, employed;
 - b. the OC content of each coating, in lbs/gallon, as applied;
 - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gallon, [The VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,2}$];
 - d. the number of gallons of each coating employed;
 - e. the OC emission rates from each coating employed (b x d) in lbs; and
 - f. the total OC emission rate from all coatings and cleanup material employed, in lbs

114

DTR I

PTI A₁

Issued: 8/28/2003

Emissions Unit ID: K026

(summation of e); and

- g. the rolling 365-day summation of the total OC emission rate, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the water wash system or the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.
2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit deviation (excursion) reports for emissions unit K026 which identify exceedances of any of the following:
 - a. any exceedances of the 3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, content restriction; and
 - b. any exceedances of the 18 tons OC per rolling, 365-day period for Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
 - a. **Emission Limitation**
0.63 lb OC/hr and 2.76 TPY OC

Applicable Compliance Method
The hourly OC emission limitation is based on the emissions unit's potential to emit*. Therefore, no recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance. The TPY limitation was developed by multiplying the lb/hr limitation by a maximum operating schedule of 8760 hrs per year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

*The potential to emit for this emissions unit was based on a maximum hourly gallon usage of 0.62 gallons per hour and a maximum OC content of 1.01 lbs per gallon.
 - b. **Emission Limitation**
0.13 lb PE/hr and 0.57 TPY PE

Applicable Compliance Method

The permittee shall demonstrate compliance with this limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate in lbs/hr}) \times (1 - TE)(1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

TE = Transfer Efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = Control Efficiency of the control equipment

Annual emissions shall be calculated based on multiplying E by the annual operating schedule for the emissions unit and dividing by 2000 lbs per ton.

If required, compliance with the PE limitations shall be based on stack testing in accordance with 40 CFR Part 60, Appendix A- Test Methods 1-5.

c. **Emission Limitation**

18 tons OC per rolling 365-day period from all Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined.

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.2 of this permit.

d. **Emission Limitation**

0% opacity as a six minute average

Applicable Compliance Method

If required, compliance with the visible PE limitation shall be determined in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

e. **Emission Limitation**

3.5 lbs VOC per gallon of coating, excluding water and exempt solvent

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.2 of this permit. Any determination of VOC content (VOC means all volatile organic compounds that in a coating material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids contents, or density of coating material shall be based

on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K026 - Paint spray machine No. 5 (B314-1) Modification to PTI # 03-13807 issued on 12/05/02 to increase the synthetic minor group limit from 8 TPY OC to 18 TPY OC.	See below	See below

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit K026 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application, the SCREEN 3.0 and Industrial Source Complex - Short Term III models. The predicted 1-hour maximum ground-level concentration from the use of the models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Triethylamine
TLV (mg/m³): 4.21
Maximum Hourly Emission Rate (lbs/hr): 0.95
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 87.37 *
MAGLC (ug/m³): 100.24

Pollutant: 2-Butoxyethanol
TLV (mg/m³): 98.2
Maximum Hourly Emission Rate (lbs/hr): 4.40
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 2075 **
MAGLC (ug/m³): 2338

* Based on ISCST3 model

** Based on Screen 3 model

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	OAC rule 3745-17-07(A)
K030 - Auto adhesive spray #7 (B360) miscellaneous metal parts coating operation (modification to PTI 03-10256, issued 3/1/01). Modification to increase synthetic minor group limit from 160 TPY OC to 255 TPY OC.	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-31-05(D)	
	OAC rule 3745-21-09(U)(2)(f)	
	OAC rule 3745-17-11(B)	

Applicable Emissions
Limitations/Control
Measures

Use of water wash or dry
 filtration system

7.0 lbs volatile organic
 compounds (VOC)/gallon of
 coating, excluding water and
 exempt solvents (see Section
 A.I.2.b.)

7.07 lbs organic compounds
 (OC)/hour, 30.97 tons
 OC/year (is inclusive of
 clean-up materials)

0.10 lb particulate emissions
 (PE)/hour, 0.44 ton PE/year

Visible PE shall not exceed
 0% opacity, as a six-minute
 average

255 tons OC per rolling,
 365-day period, from all the
 emission units identified in
 A.I.2.a. (see Section
 A.I.2.a.)

see Section A.I.2.b.

see Section A.I.2.c.

see Section A.I.2.c.

2. Additional Terms and Conditions

- 2.a** The permittee has requested a federally enforceable limitation of 255 tons OC per rolling, 365-day period from Anti-Vibration Adhesive Coating operations, emissions units: K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048 combined for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.

Rolling limits for Anti-Vibration Adhesive Coating operations were established in Permit

to Install (PTI) 03-10256 which was issued on March 1, 2001, and as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability OC limitations effectively restrict VOC emissions.

- 2.b** PTI #03-10256 was issued on March 1, 2001, with terms and conditions that defined best available technology as 7.0 lbs VOC/gallon of coating, excluding water and exempt solvents, in accordance with the requirements of OAC rule 3745-21-09(U)(2)(f).
- 2.c** The emission limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d** For the purposes of federal enforceability OC limitations effectively restrict VOC emissions.

II. Operational Restrictions

- 1. The permittee shall operate the water wash or dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
- 2. In order to demonstrate compliance with the 255 tons per rolling 365-day period and the 7.0 lbs VOC/gallon of coating, excluding water and exempt solvents, the permittee shall collect and record the following each day for emission units: K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048 combined.
 - a. the name and identification number of each coating and cleanup material;
 - b. the OC content of each coating and cleanup material, as applied;
 - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gallon, [The VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{\text{VOC},2}$];
 - d. the number of gallons of each coating and cleanup material employed;

- e. the OC emission rates from each coating and cleanup material employed (b x d); and
- f. the total OC emission rate from all coatings and cleanup material employed, (summation of e); and
- g. the rolling 365-day summation of the total OC emission rate.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit deviation (excursion) reports for emissions unit K030 which identify exceedances of any of the following:
 - a. any exceedances of the volatile organic compound content restrictions in section A.I.2.b. of this permit; and
 - b. any exceedances of the 255 tons OC per rolling, 365-day period for Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048.

V. Testing Requirements

1. Compliance with the emission limitations in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. **Emission Limitation**
7.07 lbs OC/hour

Applicable Compliance Method

The hourly OC emission limitation is based on the emission units potential to emit.* Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit is based on a two-part coating system of primer and topcoat, including cleanup materials, with a maximum usage of 1.01 gallon/hour at a maximum OC content of 7.0 lbs/gallon.

- b. **Emission Limitation**
 30.97 tons OC/year

Applicable Compliance Method

The annual emission limitation for this emission unit was based on the emission unit's potential to emit.* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was established by multiplying the lbs OC/hour limitation by the maximum operating hours, 8760 hours/year and dividing by 2000 lbs/ton.

- c. **Emission Limitation**
 0.10 lb PE/hour, 0.44 ton PE/year

Applicable Compliance Method

Compliance with the PE limitations shall be determined in accordance with the following:

The permittee may calculate the actual PE rates utilizing the following equation:

$$E = (\text{maximum coating solids usage rate in lbs/hr}) \times (1-TE) \times (1-CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

TE = Transfer Efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = Control Efficiency of the control equipment

Annual emissions shall be calculated based on multiplying E by the annual operating schedule for the emissions unit and dividing by 2000 lbs per ton.

If required, compliance with the PE limitations shall be based on stack testing in accordance with 40 CFR Part 60, Appendix A- Test Methods 1-5.

- d. **Emission Limitation**
 Visible PE shall not exceed 0% opacity, as a six-minute average

Applicable Compliance Method

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

e. **Emission Limitation**

255 tons OC per rolling 365-day period from all Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046 and K048 combined.

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.2. of this permit.

f. **Emission Limitation**

7.0 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.2 of this permit. Any determination of VOC content (VOC means all volatile organic compounds that in a coating material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K030 - Auto adhesive spray #7 (B360) miscellaneous metal parts coating operation (modification to PTI 03-10256, issued 3/1/01). Modification to increase synthetic minor group limit from 160 TPY OC to 255 TPY OC.	See below	See below

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit K030 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application, the SCREEN 3.0 and Industrial Source Complex - Short Term III models. The predicted 1-hour maximum ground-level concentration from the use of the models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). This emissions unit was previously modeled in PTI #03-10256. The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Tetrachloroethylene
 TLV (ug/m3): 170

Maximum Hourly Emission Rate (lbs/hr): 2.99
Predicted 1 Hour Maximum Ground-Level Concentration at or beyond
the Fenceline (ug/m³): 2225*
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 4048

Pollutant: Xylene
TLV (ug/m³): 434
Maximum Hourly Emission Rate (lbs/hr): 13.12
Predicted 1 Hour Maximum Ground-Level Concentration at or beyond
the Fenceline (ug/m³): 9758*
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 10333

Pollutant: Ethyl Benzene**
TLV (ug/m³): 434
Maximum Hourly Emission Rate (lbs/hr): 4.18
Predicted 1 Hour Maximum Ground-Level Concentration at or beyond
the Fenceline (ug/m³): 3353*
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 10333

Pollutant: Toluene
TLV (ug/m³): 188,000
Maximum Hourly Emission Rate (lbs/hr): 16.46
Predicted 1 Hour Maximum Ground-Level Concentration at or beyond
the Fenceline (ug/m³): 1418***
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 4476

Pollutant: Methyl Isobutyl Ketone
TLV (ug/m³): 205,000
Maximum Hourly Emission Rate (lbs/hr): 23.87

Predicted 1 Hour Maximum Ground-Level Concentration at or beyond
the Fenceline (ug/m³): 2220***
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 4881

* Based on Screen 3 model

* * The following additional conservative assumptions were made in the Screen modeling:

The remaining emissions of toxic compounds excluding Tetrachloroethylene, Toluene, Methyl Isobutyl Ketone, and Xylene in the coatings or cleaning materials were assumed

to be Ethyl Benzene which has the lowest TLV of the remaining toxic compounds.

*** Based on ISCST3 model

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

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

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	OAC rule 3745-17-07(A)
K031 - Auto adhesive spray #8 (B361) miscellaneous metal parts coating operation (modification to PTI 03-10256, issued 3/1/01). Modification to increase synthetic minor group limit from 160 TPY OC to 255 TPY OC.	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-31-05(D)	
	OAC rule 3745-21-09(U)(2)(f)	
	OAC rule 3745-17-11(B)	

Applicable Emissions
Limitations/Control
Measures

Use of water wash or dry
filtration system

7.0 lbs volatile organic
compounds (VOC)/gallon of
coating, excluding water and
exempt solvents (see Section
A.I.2.b.)

7.07 lbs organic compounds
(OC)/hour, 30.97 tons
OC/year (is inclusive of
clean-up materials)

0.10 lb particulate emissions
(PE)/hour, 0.44 ton PE/year

Visible PE shall not exceed
0% opacity, as a six-minute
average

255 tons OC per rolling,
365-day period, from all the
emission units identified in
A.I.2.a. (see Section
A.I.2.a.)

see Section A.I.2.b.

see Section A.I.2.c.

see Section A.I.2.c.

2. Additional Terms and Conditions

- 2.a** The permittee has requested a federally enforceable limitation of 255 tons OC per rolling, 365-day period from Anti-Vibration Adhesive Coating operations, emissions units: K004,

K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048 combined for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.

Rolling limits for Anti-Vibration Adhesive Coating operations were established in Permit to Install (PTI) 03-10256 which was issued on March 1, 2001, and as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability OC limitations effectively restrict VOC emissions.

- 2.b** PTI #03-10256 was issued on March 1, 2001, with terms and conditions that defined best available technology as 7.0 lbs VOC/gallon of coating, excluding water and exempt solvents, in accordance with the requirements of OAC rule 3745-21-09(U)(2)(f).
- 2.c** The emission limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d** For the purposes of federal enforceability OC limitations effectively restrict VOC emissions.

II. Operational Restrictions

- 1. The permittee shall operate the water wash or dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
- 2. In order to demonstrate compliance with the 255 tons per rolling 365-day period and the 7.0 lbs VOC/gallon of coating, excluding water and exempt solvents, the permittee shall collect and record the following each day for emission units: K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048 combined.
 - a. the name and identification number of each coating and cleanup material;
 - b. the OC content of each coating and cleanup material, as applied;
 - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in

Emissions Unit ID: K031

lbs/gallon, [The VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,2}$];

- d. the number of gallons of each coating and cleanup material employed;
- e. the OC emission rates from each coating and cleanup material employed (b x d); and
- f. the total OC emission rate from all coatings and cleanup material employed, (summation of e); and
- g. the rolling 365-day summation of the total OC emission rate.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit deviation (excursion) reports for emissions unit K031 which identify exceedances of any of the following:
 - a. any exceedances of the volatile organic compound content restrictions in section A.I.2.b. of this permit; and
 - b. any exceedances of the 255 tons OC per rolling, 365-day period for Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048.

V. Testing Requirements

1. Compliance with the emission limitations in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. **Emission Limitation**
7.07 lbs OC/hour

Applicable Compliance Method

The hourly OC emission limitation is based on the emission units potential to emit.*
Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit is based on a two-part coating system of primer and topcoat, including cleanup materials, with a maximum usage of 1.01 gallon/hour at a maximum OC content of 7.0 lbs/gallon.

- b. **Emission Limitation**
30.97 tons OC/year

Applicable Compliance Method

The annual emission limitation for this emission unit was based on the emission unit's potential to emit.* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was established by multiplying the lbs OC/hour limitation by the maximum operating hours, 8760 hours/year and dividing by 2000 lbs/ton.

- c. **Emission Limitation**
0.10 lb PE/hour, 0.44 ton PE/year

Applicable Compliance Method

Compliance with the PE limitations shall be determined in accordance with the following:

The permittee may calculate the actual PE rates utilizing the following equation:

$$E = (\text{maximum coating solids usage rate in lbs/hr}) \times (1-TE) \times (1-CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

TE = Transfer Efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = Control Efficiency of the control equipment

Annual emissions shall be calculated based on multiplying E by the annual operating schedule for the emissions unit and dividing by 2000 lbs per ton.

If required, compliance with the PE limitations shall be based on stack testing in

Emissions Unit ID: K031

accordance with 40 CFR Part 60, Appendix A- Test Methods 1-5.

d. **Emission Limitation**

Visible PE shall not exceed 0% opacity, as a six-minute average

Applicable Compliance Method

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

e. **Emission Limitation**

255 tons OC per rolling 365-day period from all Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046 and K048 combined.

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.2. of this permit.

f. **Emission Limitation**

7.0 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.2 of this permit. Any determination of VOC content (VOC means all volatile organic compounds that in a coating material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K031 - Auto adhesive spray #8 (B361) miscellaneous metal parts coating operation (modification to PTI 03-10256, issued 3/1/01). Modification to increase synthetic minor group limit from 160 TPY OC to 255 TPY OC.	See below	See below

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit K031 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application, the SCREEN 3.0 and Industrial Source Complex - Short Term III models. The predicted 1-hour maximum ground-level concentration from the use of the models was compared to the Maximum

Acceptable Ground-Level Concentration (MAGLC). This emissions unit was previously modeled in PTI #03-10256. The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Tetrachloroethylene

TLV (ug/m³): 170

Maximum Hourly Emission Rate (lbs/hr): 2.99

Predicted 1 Hour Maximum Ground-Level Concentration at or beyond the Fenceline (ug/m³): 2225*

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 4048

Pollutant: Xylene

TLV (ug/m³): 434

Maximum Hourly Emission Rate (lbs/hr): 13.12

Predicted 1 Hour Maximum Ground-Level Concentration at or beyond the Fenceline (ug/m³): 9758*

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 10333

Pollutant: Ethyl Benzene**

TLV (ug/m³): 434

Maximum Hourly Emission Rate (lbs/hr): 4.18

Predicted 1 Hour Maximum Ground-Level Concentration at or beyond the Fenceline (ug/m³): 3353*

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 10333

Pollutant: Toluene

TLV (ug/m³): 188,000

Maximum Hourly Emission Rate (lbs/hr): 16.46

Predicted 1 Hour Maximum Ground-Level Concentration at or beyond the Fenceline (ug/m³): 1418***

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 4476

Pollutant: Methyl Isobutyl Ketone

TLV (ug/m³): 205,000

Maximum Hourly Emission Rate (lbs/hr): 23.87

Predicted 1 Hour Maximum Ground-Level Concentration at or beyond the Fenceline (ug/m³): 2220***

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 4881

Emissions Unit ID: K031

* Based on Screen 3 model

** The following additional conservative assumptions were made in the Screen modeling:

The remaining emissions of toxic compounds excluding Tetrachloroethylene, Toluene, Methyl Isobutyl Ketone, and Xylene in the coatings or cleaning materials were assumed to be Ethyl Benzene which has the lowest TLV of the remaining toxic compounds.

*** Based on ISCST3 model

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

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

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K032 - Auto adhesive spray #9 (B362) miscellaneous metal parts coating operation (modification to PTI 03-10256, issued 3/1/01). Modification to increase synthetic minor group limit from 160 TPY OC to 255 TPY OC.	OAC rule 3745-31-05(A)(3)	Use of water wash or dry filtration system 7.0 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents (see Section A.I.2.b.) 7.07 lbs organic compounds (OC)/hour, 30.97 tons OC/year (is inclusive of clean-up materials) 0.10 lb particulate emissions (PE)/hour, 0.44 ton PE/year Visible PE shall not exceed 0% opacity, as a six-minute average
	OAC rule 3745-31-05(D)	255 tons OC per rolling, 365-day period, from all the emission units identified in A.I.2.a. (see Section A.I.2.a.)
	OAC rule 3745-21-09(U)(2)(f)	see Section A.I.2.b.
	OAC rule 3745-17-11(B)	see Section A.I.2.c.
	OAC rule 3745-17-07(A)	see Section A.I.2.c.

2. Additional Terms and Conditions

- 2.a The permittee has requested a federally enforceable limitation of 255 tons OC per rolling, 365-day period from Anti-Vibration Adhesive Coating operations, emissions units: K004,

K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048 combined for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.

Rolling limits for Anti-Vibration Adhesive Coating operations were established in Permit to Install (PTI) 03-10256 which was issued on March 1, 2001, and as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability OC limitations effectively restrict VOC emissions.

- 2.b** PTI #03-10256 was issued on March 1, 2001, with terms and conditions that defined best available technology as 7.0 lbs VOC/gallon of coating, excluding water and exempt solvents, in accordance with the requirements of OAC rule 3745-21-09(U)(2)(f).
- 2.c** The emission limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d** For the purposes of federal enforceability OC limitations effectively restrict VOC emissions.

II. Operational Restrictions

- 1. The permittee shall operate the water wash or dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
- 2. In order to demonstrate compliance with the 255 tons per rolling 365-day period and the 7.0 lbs VOC/gallon of coating, excluding water and exempt solvents, the permittee shall collect and record the following each day for emission units: K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048 combined.
 - a. the name and identification number of each coating and cleanup material;
 - b. the OC content of each coating and cleanup material, as applied;
 - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in

lbs/gallon, [The VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{\text{VOC},2}$];

- d. the number of gallons of each coating and cleanup material employed;
- e. the OC emission rates from each coating and cleanup material employed (b x d); and
- f. the total OC emission rate from all coatings and cleanup material employed, (summation of e); and
- g. the rolling 365-day summation of the total OC emission rate.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit deviation (excursion) reports for emissions unit K032 which identify exceedances of any of the following:
 - a. any exceedances of the volatile organic compound content restrictions in section A.I.2.b. of this permit; and
 - b. any exceedances of the 255 tons OC per rolling, 365-day period for Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048.

V. Testing Requirements

1. Compliance with the emission limitations in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. **Emission Limitation**
7.07 lbs OC/hour

Applicable Compliance Method

The hourly OC emission limitation is based on the emission units potential to emit.* Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit is based on a two-part coating system of primer and topcoat, including cleanup materials, with a maximum usage of 1.01 gallon/hour at a maximum OC content of 7.0 lbs/gallon.

b. **Emission Limitation**

30.97 tons OC/year

Applicable Compliance Method

The annual emission limitation for this emission unit was based on the emission unit's potential to emit.* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was established by multiplying the lbs OC/hour limitation by the maximum operating hours, 8760 hours/year and dividing by 2000 lbs/ton.

c. **Emission Limitation**

0.10 lb PE/hour, 0.44 ton PE/year

Applicable Compliance Method

Compliance with the PE limitations shall be determined in accordance with the following:

The permittee may calculate the actual PE rates utilizing the following equation:

$$E = (\text{maximum coating solids usage rate in lbs/hr}) \times (1-TE) \times (1-CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

TE = Transfer Efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = Control Efficiency of the control equipment

Annual emissions shall be calculated based on multiplying E by the annual operating schedule for the emissions unit and dividing by 2000 lbs per ton.

If required, compliance with the PE limitations shall be based on stack testing in

accordance with 40 CFR Part 60, Appendix A- Test Methods 1-5.

d. **Emission Limitation**

Visible PE shall not exceed 0% opacity, as a six-minute average

Applicable Compliance Method

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

e. **Emission Limitation**

255 tons OC per rolling 365-day period from all Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046 and K048 combined.

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.2. of this permit.

f. **Emission Limitation**

7.0 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.2 of this permit. Any determination of VOC content (VOC means all volatile organic compounds that in a coating material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K032 - Auto adhesive spray #9 (B362) miscellaneous metal parts coating operation (modification to PTI 03-10256, issued 3/1/01). Modification to increase synthetic minor group limit from 160 TPY OC to 255 TPY OC.	See below	See below

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit K032 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application, the SCREEN 3.0 and Industrial Source Complex - Short Term III models. The predicted 1-hour maximum ground-level concentration from the use of the models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). This emissions unit was previously modeled in PTI #03-10256. The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Tetrachloroethylene
 TLV (ug/m3): 170

Issued: 8/28/2003

Maximum Hourly Emission Rate (lbs/hr): 2.99
Predicted 1 Hour Maximum Ground-Level Concentration at or beyond
the Fenceline (ug/m³): 2225*
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 4048

Pollutant: Xylene
TLV (ug/m³): 434
Maximum Hourly Emission Rate (lbs/hr): 13.12
Predicted 1 Hour Maximum Ground-Level Concentration at or beyond
the Fenceline (ug/m³): 9758*
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 10333

Pollutant: Ethyl Benzene**
TLV (ug/m³): 434
Maximum Hourly Emission Rate (lbs/hr): 4.18
Predicted 1 Hour Maximum Ground-Level Concentration at or beyond
the Fenceline (ug/m³): 3353*
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 10333

Pollutant: Toluene
TLV (ug/m³): 188,000
Maximum Hourly Emission Rate (lbs/hr): 16.46
Predicted 1 Hour Maximum Ground-Level Concentration at or beyond
the Fenceline (ug/m³): 1418***
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 4476

Pollutant: Methyl Isobutyl Ketone
TLV (ug/m³): 205,000
Maximum Hourly Emission Rate (lbs/hr): 23.87

Predicted 1 Hour Maximum Ground-Level Concentration at or beyond
the Fenceline (ug/m³): 2220***
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m³): 4881

* Based on Screen 3 model

* * The following additional conservative assumptions were made in the Screen modeling:

The remaining emissions of toxic compounds excluding Tetrachloroethylene, Toluene, Methyl Isobutyl Ketone, and Xylene in the coatings or cleaning materials were assumed

to be Ethyl Benzene which has the lowest TLV of the remaining toxic compounds.

*** Based on ISCST3 model

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

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

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	OAC rule 3745-17-07(A)
K033 - Manual adhesive spray 5 (B365-1,2)-miscellaneous metal parts coating operation (modification to PTI 03-10256, issued 3/1/01). Modification to increase hourly and annual emission limitations and synthetic minor group limit from 160 TPY OC to 255 TPY OC.	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-31-05(D)	
	OAC rule 3745-21-09(U)(2)(f)	
	OAC rule 3745-17-11(B)	

151

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PTI A₁

Issued: 8/28/2003

Emissions Unit ID: K033

Applicable Emissions
Limitations/Control
Measures

Use of water wash or dry
filtration system

7.0 lbs volatile organic
compounds (VOC)/gallon of
coating, excluding water and
exempt solvents (see Section
A.I.2.b.)

11.69 lbs organic
compounds (OC)/hour,
51.20 tons OC/year (is
inclusive of clean-up
materials)

0.11 lb particulate emissions
(PE)/hour, 0.48 ton PE/year

Visible PE shall not exceed
0% opacity, as a six-minute
average

255 tons OC per rolling,
365-day period, from all the
emission units identified in
A.I.2.a. (see Section
A.I.2.a.)

see Section A.I.2.b.

see Section A.I.2.c.

see Section A.I.2.c.

2. Additional Terms and Conditions

2.a The permittee has requested a federally enforceable limitation of 255 tons OC per rolling,

365-day period from Anti-Vibration Adhesive Coating operations, emissions units: K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048 combined for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.

Rolling limits for Anti-Vibration Adhesive Coating operations were established in Permit to Install (PTI) 03-10256 which was issued on March 1, 2001, and as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability OC limitations effectively restrict VOC emissions.

- 2.b** PTI #03-10256 was issued on March 1, 2001, with terms and conditions that defined best available technology as 7.0 lbs VOC/gallon of coating, excluding water and exempt solvents, in accordance with the requirements of OAC rule 3745-21-09(U)(2)(f).
- 2.c** The emission limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d** For the purposes of federal enforceability OC limitations effectively restrict VOC emissions.

II. Operational Restrictions

- 1. The permittee shall operate the water wash or dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
- 2. In order to demonstrate compliance with the 255 tons per rolling 365-day period and the 7.0 lbs VOC/gallon of coating, excluding water and exempt solvents, the permittee shall collect and record the following each day for emission units: K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048 combined.
 - a. the name and identification number of each coating and cleanup material;
 - b. the OC content of each coating and cleanup material, as applied;

Emissions Unit ID: K033

- c. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gallon, [The VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,2}$];
- d. the number of gallons of each coating and cleanup material employed;
- e. the OC emission rates from each coating and cleanup material employed (b x d); and
- f. the total OC emission rate from all coatings and cleanup material employed, (summation of e); and
- g. the rolling 365-day summation of the total OC emission rate.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit deviation (excursion) reports for emissions unit K033 which identify exceedances of any of the following:
 - a. any exceedances of the volatile organic compound content restrictions in section A.I.2.b. of this permit; and
 - b. any exceedances of the 255 tons OC per rolling, 365-day period for Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048.

V. Testing Requirements

1. Compliance with the emission limitations in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. **Emission Limitation**
11.69 lbs OC/hour

Applicable Compliance Method

The hourly OC emission limitation is based on the emission units potential to emit.* Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit is based on a two-part coating system of primer and topcoat, including cleanup materials, with a maximum usage of 1.67 gallon/hour at a maximum OC content of 7.0 lbs/gallon.

- b. **Emission Limitation**
51.20 tons OC/year

Applicable Compliance Method

The annual emission limitation for this emission unit was based on the emission unit's potential to emit.* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was established by multiplying the lbs OC/hour limitation by the maximum operating hours, 8760 hours/year and dividing by 2000 lbs/ton.

- c. **Emission Limitation**
0.11 lb PE/hour, 0.48 ton PE/year

Applicable Compliance Method

Compliance with the PE limitations shall be determined in accordance with the following:

The permittee may calculate the actual PE rates utilizing the following equation:

$$E = (\text{maximum coating solids usage rate in lbs/hr}) \times (1-TE) \times (1-CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

TE = Transfer Efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = Control Efficiency of the control equipment

Annual emissions shall be calculated based on multiplying E by the annual operating schedule for the emissions unit and dividing by 2000 lbs per ton.

Emissions Unit ID: K033

If required, compliance with the PE limitations shall be based on stack testing in accordance with 40 CFR Part 60, Appendix A- Test Methods 1-5.

d. **Emission Limitation**

Visible PE shall not exceed 0% opacity, as a six-minute average

Applicable Compliance Method

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

e. **Emission Limitation**

255 tons OC per rolling 365-day period from all Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046 and K048 combined.

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.2. of this permit.

f. **Emission Limitation**

7.0 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.2 of this permit. Any determination of VOC content (VOC means all volatile organic compounds that in a coating material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K033 - Manual adhesive spray 5 (B365-1,2)-miscellaneous metal parts coating operation (administrative modification to PTI 03-10256, issued 3/1/01). Modification to increase hourly and annual emission limitations and synthetic minor group limit from 160 TPY OC to 255 TPY OC.	See below	See below

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions unit K033, and K039 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied

Emissions Unit ID: K033

for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: methyl isobutyl ketone
TLV (mg/m³): 204.82
Maximum Hourly Emission Rate (lbs/hr): 4.91*
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 1440
MAGLC (ug/m³): 4877

Pollutant: toluene
TLV (mg/m³): 188.40
Maximum Hourly Emission Rate (lbs/hr): 6.6**
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 1937
MAGLC (ug/m³): 4486

Pollutant: methyl ethyl ketone
TLV (mg/m³): 589.78
Maximum Hourly Emission Rate (lbs/hr): 0.09***
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 20.60
MAGLC (ug/m³): 14042

*Combined emission rates for K033, and K039.

**Emission rate for K033.

***Emission rate for K039.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the compositions of the materials, or use of new materials that would result in

an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K035 - Paint spray machine No. 6 (B491-1) Modification to PTI # 03-13807 issued on 12/05/02 to increase the synthetic minor group limit from 8 TPY OC to 18 TPY OC.	OAC rule 3745-31-05 (A)(3)	Use of water wash or dry filtration system 0.63 lb organic compounds (OC)/hr, 2.76 tons OC/yr 0.13 lb particulate emissions (PE)/hr, 0.57 tons PE/yr 0% opacity as a six-minute average See A.I.2.a.
	OAC rule 3745-17-07(A)	See A.I.2.b.
	OAC rule 3745-17-11(B)	See A.I.2.b.
	OAC rule 3745-21-09(U)(1)(c)	3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, for an extreme performance coating.
	OAC rule 3745-31-05(D)	18.0 tons OC per rolling, 365-day period, from all the emission units identified in A.I.2.c. (see Section A.I.2.c)

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with OAC rule 3745-21-09(U)(1)(c) and OAC rule 3745-31-05(D).
- 2.b The emission limit specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

- 2.c** The permittee has requested a federally enforceable limitation of 18 tons OC per rolling, 365-day period from Anti-Vibration Water-Borne Painting operations, emissions units: K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.

Rolling limits for Anti-Vibration Adhesive Coating operations were established in Permit to Install (PTI) 03-13807 which was issued on December 5, 2002, and as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability OC limitations effectively restrict VOC emissions.

II. Operational Restrictions

1. The permittee shall operate the water wash system or the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records that document any time periods when the water wash system or the dry filtration system was not in service when the emissions unit was in operation.
2. In order to demonstrate compliance with the 18 tons per rolling 365-day period and the 3.5 lbs VOC/gallon of coating, excluding water and exempt solvents, the permittee shall collect and record the following each day for emission units: K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined.
 - a. the name and identification number of each coating, employed;
 - b. the OC content of each coating, in lbs/gallon, as applied;
 - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gallon, [The VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,2}$];
 - d. the number of gallons of each coating employed;
 - e. the OC emission rates from each coating employed (b x d) in lbs; and

161

DTR I

PTI A₁

Issued: 8/28/2003

Emissions Unit ID: K035

- f. the total OC emission rate from all coatings and cleanup material employed, in lbs (summation of e); and
- g. the rolling 365-day summation of the total OC emission rate, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the water wash system or the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.
2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit deviation (excursion) reports for emissions unit K035 which identify exceedances of any of the following:
 - a. any exceedances of the 3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, content restriction; and
 - b. any exceedances of the 18 tons OC per rolling, 365-day period for Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

- a. **Emission Limitation**
0.63 lb OC/hr and 2.76 TPY OC

Applicable Compliance Method

The hourly OC emission limitation is based on the emissions unit's potential to emit*. Therefore, no recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance. The TPY limitation was developed by multiplying the lb/hr limitation by a maximum operating schedule of 8760 hrs per year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

*The potential to emit for this emissions unit was based on a maximum hourly gallon usage of 0.62 gallons per hour and a maximum OC content of 1.01 lbs per gallon.

- b. **Emission Limitation**
0.13 lb PE/hr and 0.57 TPY PE

Applicable Compliance Method

The permittee shall demonstrate compliance with this limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate in lbs/hr}) \times (1 - TE)(1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

TE = Transfer Efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = Control Efficiency of the control equipment

Annual emissions shall be calculated based on multiplying E by the annual operating schedule for the emissions unit and dividing by 2000 lbs per ton.

If required, compliance with the PE limitations shall be based on stack testing in accordance with 40 CFR Part 60, Appendix A- Test Methods 1-5.

c. **Emission Limitation**

18 tons OC per rolling 365-day period from all Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined.

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.2 of this permit.

d. **Emission Limitation**

0% opacity as a six minute average

Applicable Compliance Method

If required, compliance with the visible PE limitation shall be determined in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

e. **Emission Limitation**

3.5 lbs VOC per gallon of coating, excluding water and exempt solvent

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.2 of this permit. Any determination of VOC content (VOC means all volatile organic compounds that in a coating material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids contents, or density of coating material shall be based

on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K035 - Paint spray machine No. 6 (B491-1) Modification to PTI # 03-13807 issued on 12/05/02 to increase the synthetic minor group limit from 8 TPY OC to 18 TPY OC.	See below	See below

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit K035 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application, the SCREEN 3.0 and Industrial Source Complex - Short Term III models. The predicted 1-hour maximum ground-level concentration from the use of the models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Triethylamine
TLV (mg/m3): 4.21
Maximum Hourly Emission Rate (lbs/hr): 0.95
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 87.37 *
MAGLC (ug/m3): 100.24

Pollutant: 2-Butoxyethanol
TLV (mg/m3): 98.2
Maximum Hourly Emission Rate (lbs/hr): 4.40
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 2075 **
MAGLC (ug/m3): 2338

* Based on ISCST3 model

** Based on Screen 3 model

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K036 - Paint spray machine No. 7 (B510-1) Modification to PTI # 03-13807 issued on 12/05/02 to increase the synthetic minor group limit from 8 TPY OC to 18 TPY OC.	OAC rule 3745-31-05 (A)(3)	Use of water wash or dry filtration system 0.63 lb organic compounds (OC)/hr, 2.76 tons OC/yr 0.13 lb particulate emissions (PE)/hr, 0.57 tons PE/yr 0% opacity as a six-minute average See A.I.2.a.
	OAC rule 3745-17-07(A)	See A.I.2.b.
	OAC rule 3745-17-11(B)	See A.I.2.b.
	OAC rule 3745-21-09(U)(1)(c)	3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, for an extreme performance coating.
	OAC rule 3745-31-05(D)	18.0 tons OC per rolling, 365-day period, from all the emission units identified in A.I.2.c. (see Section A.I.2.c)

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with OAC rule 3745-21-09(U)(1)(c) and OAC rule 3745-31-05(D).
- 2.b The emission limit specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

- 2.c** The permittee has requested a federally enforceable limitation of 18 tons OC per rolling, 365-day period from Anti-Vibration Water-Borne Painting operations, emissions units: K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.

Rolling limits for Anti-Vibration Adhesive Coating operations were established in Permit to Install (PTI) 03-13807 which was issued on December 5, 2002, and as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability OC limitations effectively restrict VOC emissions.

II. Operational Restrictions

1. The permittee shall operate the water wash system or the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records that document any time periods when the water wash system or the dry filtration system was not in service when the emissions unit was in operation.
2. In order to demonstrate compliance with the 18 tons per rolling 365-day period and the 3.5 lbs VOC/gallon of coating, excluding water and exempt solvents, the permittee shall collect and record the following each day for emission units: K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined.
 - a. the name and identification number of each coating, employed;
 - b. the OC content of each coating, in lbs/gallon, as applied;
 - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gallon, [The VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,2}$];
 - d. the number of gallons of each coating employed;
 - e. the OC emission rates from each coating employed (b x d) in lbs; and

170

DTR I

PTI A₁

Issued: 8/28/2003

Emissions Unit ID: K036

- f. the total OC emission rate from all coatings and cleanup material employed, in lbs (summation of e); and
- g. the rolling 365-day summation of the total OC emission rate, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the water wash system or the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.
2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit deviation (excursion) reports for emissions unit K036 which identify exceedances of any of the following:
 - a. any exceedances of the 3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, content restriction; and
 - b. any exceedances of the 18 tons OC per rolling, 365-day period for Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
 - a. **Emission Limitation**
0.63 lb OC/hr and 2.76 TPY OC

Applicable Compliance Method

The hourly OC emission limitation is based on the emissions unit's potential to emit*. Therefore, no recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance. The TPY limitation was developed by multiplying the lb/hr limitation by a maximum operating schedule of 8760 hrs per year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

*The potential to emit for this emissions unit was based on a maximum hourly gallon usage of 0.62 gallons per hour and a maximum OC content of 1.01 lbs per gallon.

- b. **Emission Limitation**
0.13 lb PE/hr and 0.57 TPY PE

Applicable Compliance Method

The permittee shall demonstrate compliance with this limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate in lbs/hr}) \times (1 - TE)(1 - CE)$$

where:

E = PE rate (lbs/hr)

TE = Transfer Efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = Control Efficiency of the control equipment

Annual emissions shall be calculated based on multiplying E by the annual operating schedule for the emissions unit and dividing by 2000 lbs per ton.

If required, compliance with the PE limitations shall be based on stack testing in accordance with 40 CFR Part 60, Appendix A- Test Methods 1-5.

- c. **Emission Limitation**
18 tons OC per rolling 365-day period from all Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined.

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.2 of this permit.

- d. **Emission Limitation**
0% opacity as a six minute average

Applicable Compliance Method

If required, compliance with the visible PE limitation shall be determined in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

- e. **Emission Limitation**
3.5 lbs VOC per gallon of coating, excluding water and exempt solvent

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.2 of this permit. Any determination of VOC content (VOC means all volatile organic compounds that in a coating material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids contents, or density of coating material shall be based

173

DTR I

PTI A₁

Issued: 8/28/2003

Emissions Unit ID: K036

on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K036 - Paint spray machine No. 7 (B510-1) Modification to PTI # 03-13807 issued on 12/05/02 to increase the synthetic minor group limit from 8 TPY OC to 18 TPY OC.	See below	See below

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit K036 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application, the SCREEN 3.0 and Industrial Source Complex - Short Term III models. The predicted 1-hour maximum ground-level concentration from the use of the models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Triethylamine
 TLV (mg/m3): 4.21
 Maximum Hourly Emission Rate (lbs/hr): 0.95
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 87.37 *

MAGLC (ug/m3): 100.24

Pollutant: 2-Butoxyethanol

TLV (mg/m3): 98.2

Maximum Hourly Emission Rate (lbs/hr): 4.40

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 2075 **

MAGLC (ug/m3): 2338

* Based on ISCST3 model

** Based on Screen 3 model

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

Emissions Unit ID: K036

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K039 - Manual adhesive dipping machine (A12)-miscellaneous metal parts coating operation (modification to PTI 03-10256, issued 3/1/01). Modification to increase hourly and annual emission limitations.	OAC rule 3745-31-05(A)(3)	6.42 lbs volatile organic compounds (VOC)/gallon of coating, excluding water and exempt solvents (see Section A.I.2.a)
		0.16 lb OC/hour, 0.70 tons OC/year from coating operations
		110 lbs OC/month, 0.66 tons OC/year from clean-up operations
	OAC rule 3745-21-09(U)(2)(f)	see Section A.I.2.a.

2. Additional Terms and Conditions

- 2.a PTI #03-10256 was issued on March 1, 2001, with terms and conditions that defined best available technology as 6.42 lbs VOC/gallon of coating, excluding water and exempt solvents, in accordance with the requirements of OAC rule 3745-21-09(U)(2)(f).

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and maintain the following information each month for emissions unit

K039:

- a. the name and identification number of each coating, employed;
 - b. the OC content of each coating, as applied, in lbs/gal;
 - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gallon, [The VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,2}$];
 - d. the number of gallons of each coating employed;
 - e. the OC emission rate for each coating employed, (b x d) in lbs; and
 - f. the total OC emission rate for all coatings, summation of (e) in lbs per month;
 - g. the annual, year to date total OC emissions from all coatings employed, in tons, (summation of f for each calendar month to date from January to December).
2. The permittee shall collect and maintain monthly records of the following information for the clean-up operations:
- a. the name and identification number of each clean-up material, employed;
 - b. the number of gallons of each clean-up material employed;
 - c. the OC content of each clean-up material, employed, in lbs/gal;
 - d. the OC input rate for clean-up material, (b) x (c), in lbs per month;
 - e. the total OC emission rate for all coatings, summation of (d) in lbs per month;
 - f. the annual, year to date total OC emissions from all coatings employed, in tons, (summation of e for each calendar month to date from January to December).

IV. Reporting Requirements

1. The permittee shall submit annual written reports of any deviations (excursions) from the annual emission limitation in section A.1. of this permit. If no deviations occurred during a calendar

year, the permittee shall submit an annual report, which states that no deviations occurred during that calendar year. The reports shall be submitted annually by January 31 of each year and shall cover the previous calendar year.

2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit deviation (excursion) reports for emissions unit K039 which identify exceedances of the following:
 - a. any exceedances of the 6.42 lbs VOC per gallon of coating, excluding water and exempt solvents, content restriction.

V. Testing Requirements

1. Compliance with the emission limitations in section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. **Emission Limitation**

0.16 lb OC/hour

Applicable Compliance Method

The hourly OC emission limitation is based on the emission units potential to emit.* Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit is based on a single coating, with a maximum usage of 0.025 gallon/hour at a maximum OC content of 6.42 lbs/gallon.

- b. **Emission Limitation**

0.70 tons OC/year

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.1. of this permit.

- c. **Emission Limitation**

110 lbs OC/month and 0.66 TPY OC from clean-up

Applicable Compliance Method

Compliance shall be based upon the recordkeeping in section A.III.2.

- d. **Emission Limitation**

6.42 lbs VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.1 of this permit. Any determination of VOC content (VOC means all volatile organic compounds that in a coating material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

181

DTR I

PTI A₁

Issued: 8/28/2003

Emissions Unit ID: K039

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K039 - Manual adhesive dipping machine (A12)-miscellaneous metal parts coating operation (administrative modification to PTI 03-10256, issued 3/1/01). Modification to increase hourly and annual emission limitations.	See below	See below

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions unit K033, and K039 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to

the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: methyl isobutyl ketone
TLV (mg/m³): 204.82
Maximum Hourly Emission Rate (lbs/hr): 4.91*
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 1440
MAGLC (ug/m³): 4877

Pollutant: toluene
TLV (mg/m³): 188.40
Maximum Hourly Emission Rate (lbs/hr): 6.6**
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 1937
MAGLC (ug/m³): 4486

Pollutant: methyl ethyl ketone
TLV (mg/m³): 589.78
Maximum Hourly Emission Rate (lbs/hr): 0.09***
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 20.60
MAGLC (ug/m³): 14042

*Combined emission rates for K033, and K039.

**Emission rate for K033.

***Emission rate for K039.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists

(ACGIH)," than the lowest TLV value previously modeled;

- b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K040 - Adhesive dipping machine (A64)- miscellaneous metal parts coating operation	OAC rule 3745-31-05(A)	0.40 lb organic compounds (OC)/hour, 1.75 tons OC/year
	OAC rule 3745-21-09(U)(2)(e)(iii)	see Section A.I.2.a.

2. Additional Terms and Conditions

- 2.a The emissions limitation established by this rule is less stringent than those established by OAC rule 3745-31-05 (BAT).

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions unit K040:
 - a. the name and identification number of each coating, as applied;
 - b. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gallon, [The VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,2}$];

- c. the OC content of each coating, as applied, in lbs/gal;
- d. the number of gallons of each coating employed;
- e. the OC emission rate for each coating, (c) x (d) x 1 ton/2000 lbs, in lbs per month;
- f. the total OC emission rate for all coatings, summation of (e) in lbs per month;
- g. the annual, year to date total OC emissions from all coatings employed, in tons (summation of f for each calendar month to date from January to December).

IV. Reporting Requirements

1. The permittee shall submit annual written reports of any deviations (excursions) from the annual emission limitation of this permit. The reports shall be submitted annually, by January 31 of each year and shall cover the previous calendar year.

V. Testing Requirements

1. Compliance with the emission limitations in section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. **Emission Limitation**
0.40 lb OC/hour

Applicable Compliance Method

The hourly OC emission limitation is based on the emission units potential to emit.* Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit is based on a single coating with a maximum usage of 0.059 gallon/hour at a maximum OC content of 6.71 lbs/gallon.

- b. **Emission Limitation**
1.75 tons OC/year

Applicable Compliance Method

Compliance with this limitation shall be based upon the recordkeeping in section A.III.1.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K040 - Adhesive dipping machine (A64)- miscellaneous metal parts coating operation	See below	See below

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions unit K040 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: methyl isobutyl ketone
 TLV (mg/m³): 204.82

188

DTR Industries Inc

PTI Application: 02 12020

Issued

Facility ID: 0302000166

Emissions Unit ID: K040

Maximum Hourly Emission Rate (lbs/hr): 0.00002

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 0.01057

MAGLC (ug/m3): 4877

Pollutant: methyl ethyl ketone
TLV (mg/m³): 589.78
Maximum Hourly Emission Rate (lbs/hr): 0.30
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 141.00
MAGLC (ug/m³): 14042

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

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

- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K041 - Paint spray machine No. 8 (B602-1) Modification to PTI # 03-13807 issued on 12/05/02 to increase the synthetic minor group limit from 8 TPY OC to 18 TPY OC.	OAC rule 3745-31-05 (A)(3)	Use of water wash or dry filtration system 0.63 lb organic compounds (OC)/hr, 2.76 tons OC/yr 0.13 lb particulate emissions (PE)/hr, 0.57 tons PE/yr 0% opacity as a six-minute average See A.I.2.a.
	OAC rule 3745-17-07(A)	See A.I.2.b.
	OAC rule 3745-17-11(B)	See A.I.2.b.
	OAC rule 3745-21-09(U)(1)(c)	3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, for an extreme performance coating.
	OAC rule 3745-31-05(D)	18.0 tons OC per rolling, 365-day period, from all the emission units identified in A.I.2.c. (see Section A.I.2.c)

2. Additional Terms and Conditions

Emissions Unit ID: K041

- 2.a** The requirements of this rule also include compliance with OAC rule 3745-21-09(U)(1)(c) and OAC rule 3745-31-05(D).
- 2.b** The emission limit specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.c** The permittee has requested a federally enforceable limitation of 18 tons OC per rolling, 365-day period from Anti-Vibration Water-Borne Painting operations, emissions units: K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.

Rolling limits for Anti-Vibration Adhesive Coating operations were established in Permit to Install (PTI) 03-13807 which was issued on December 5, 2002, and as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability OC limitations effectively restrict VOC emissions.

II. Operational Restrictions

1. The permittee shall operate the water wash system or the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records that document any time periods when the water wash system or the dry filtration system was not in service when the emissions unit was in operation.
2. In order to demonstrate compliance with the 18 tons per rolling 365-day period and the 3.5 lbs VOC/gallon of coating, excluding water and exempt solvents, the permittee shall collect and record the following each day for emission units: K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined.
 - a. the name and identification number of each coating, employed;
 - b. the OC content of each coating, in lbs/gallon, as applied;
 - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gallon, [The VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,2}$];
 - d. the number of gallons of each coating employed;
 - e. the OC emission rates from each coating employed (b x d) in lbs; and
 - f. the total OC emission rate from all coatings and cleanup material employed, in lbs

193

DTR I

PTI A₁

Issued: 8/28/2003

Emissions Unit ID: K041

(summation of e); and

- g. the rolling 365-day summation of the total OC emission rate, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the water wash system or the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.
2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit deviation (excursion) reports for emissions unit K041 which identify exceedances of any of the following:
 - a. any exceedances of the 3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, content restriction; and
 - b. any exceedances of the 18 tons OC per rolling, 365-day period for Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
 - a. **Emission Limitation**
0.63 lb OC/hr and 2.76 TPY OC

Applicable Compliance Method

The hourly OC emission limitation is based on the emissions unit's potential to emit*. Therefore, no recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance. The TPY limitation was developed by multiplying the lb/hr limitation by a maximum operating schedule of 8760 hrs per year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

*The potential to emit for this emissions unit was based on a maximum hourly gallon usage of 0.62 gallons per hour and a maximum OC content of 1.01 lbs per gallon.

- b. **Emission Limitation**
0.13 lb PE/hr and 0.57 TPY PE

Applicable Compliance Method

The permittee shall demonstrate compliance with this limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate in lbs/hr}) \times (1 - TE)(1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

TE = Transfer Efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = Control Efficiency of the control equipment

Annual emissions shall be calculated based on multiplying E by the annual operating schedule for the emissions unit and dividing by 2000 lbs per ton.

If required, compliance with the PE limitations shall be based on stack testing in accordance with 40 CFR Part 60, Appendix A- Test Methods 1-5.

c. **Emission Limitation**

18 tons OC per rolling 365-day period from all Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined.

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.2 of this permit.

d. **Emission Limitation**

0% opacity as a six minute average

Applicable Compliance Method

If required, compliance with the visible PE limitation shall be determined in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

e. **Emission Limitation**

3.5 lbs VOC per gallon of coating, excluding water and exempt solvent

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.2 of this permit. Any determination of VOC content (VOC means all volatile organic compounds that in a coating material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids contents, or density of coating material shall be based

on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K041 - Paint spray machine No. 8 (B602-1) Modification to PTI # 03-13807 issued on 12/05/02 to increase the synthetic minor group limit from 8 TPY OC to 18 TPY OC.	See below	See below

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit K041 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application, the SCREEN 3.0 and Industrial Source Complex - Short Term III models. The predicted 1-hour maximum ground-level concentration from the use of the models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Triethylamine
TLV (mg/m3): 4.21
Maximum Hourly Emission Rate (lbs/hr): 0.95
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 87.37 *
MAGLC (ug/m3): 100.24

Pollutant: 2-Butoxyethanol
TLV (mg/m3): 98.2
Maximum Hourly Emission Rate (lbs/hr): 4.40
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 2075 **
MAGLC (ug/m3): 2338

* Based on ISCST3 model

** Based on Screen 3 model

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K042 - Hose adhesive coating machine 2 (H192)-coating operation	OAC rule 3745-31-05(A)(3)	0.20 lb organic compounds (OC)/hour, 0.88 ton OC/year
	OAC rule 3745-21-07(G)(2)	see Section A.I.2.a.

2. **Additional Terms and Conditions**

- 2.a The emissions limitation established by this rule is less stringent than those established by OAC rule 3745-31-05 (BAT).

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions unit K042:
 - a. the name and identification number of each coating, as applied;
 - b. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gallon, [The VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,2}$];

- c. the OC content of each coating, as applied, in lbs/gal;
- d. the number of gallons of each coating employed;
- e. the OC emission rate for each coating, (c) x (d) x 1 ton/2000 lbs, in lbs per month;
- f. the total OC emission rate for all coatings, summation of (e) in lbs per month;
- g. the annual, year to date total OC emissions from all coatings employed, in tons (summation of f for each calendar month to date from January to December).

IV. Reporting Requirements

1. The permittee shall submit annual written reports of any deviations (excursions) from the annual emission limitation of this permit. The reports shall be submitted annually, by January 31 of each year and shall cover the previous calendar year.

V. Testing Requirements

1. Compliance with the emission limitations in section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. **Emission Limitation**
0.20 lb OC/hour

Applicable Compliance Method

The hourly OC emission limitation is based on the emission units potential to emit.* Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit is based on a single coating with a maximum usage of 0.027 gallon/hour at a maximum OC content of 7.27 lbs/gallon.

- b. **Emission Limitation**
0.88 ton OC/year

Applicable Compliance Method

Compliance shall be based upon the recordkeeping requirements specified in section A.III.1.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K042 - Hose adhesive coating machine 2 (H192)-coating operation utilizing photochemically reactive materials	See below	See below

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions units K042 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene

TLV (mg/m³): 188.40
 Maximum Hourly Emission Rate (lbs/hr): 0.20
 Predicted 1-Hour Maximum Ground-Level
 Concentration (ug/m³): 73.3
 MAGLC (ug/m³): 4486

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

204

DTR I

PTI A₁

Issued: 8/28/2003

Emissions Unit ID: K042

IV. Reporting Requirements

None

205

DTR I

PTI A₁

Issued: 8/28/2003

Emissions Unit ID: K042

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
K043 - Manual adhesive spray machine (B540-1,2)-miscellaneous metal parts coating operation	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-07(A)
	OAC rule 3745-31-05(D)	OAC rule 3745-21-09(U)(2)(e)(iii)
	OAC rule 3745-17-11(B)	

207

DTR I

PTI A₁

Issued: 8/28/2003

Emissions Unit ID: K043

Applicable Emissions
Limitations/Control
Measures

Use of water wash or dry filtration system

0.10 lb particulate emissions (PE)/hour, 0.44 ton PE/year

Visible PE shall not exceed 0% opacity, as a six-minute average

63.70 lbs organic compounds (OC)/day, 11.63 tons OC/year from primer coating operations

67.30 lbs OC/day, 12.28 tons OC/year from topcoat coating operations

0.07 ton OC/month, 0.87 ton OC/year from cleanup materials

See A.I.2.a

255 tons OC per rolling, 365-day period, from all the emission units identified in A.I.2.b. (see Section A.I.2.b.)

see Section A.I.2.c.

see Section A.I.2.c.

VOC emission exemption,

based on maximum daily coating usage for primer coating operations not exceeding 10 gallons of coating in any one day, and topcoat operations not exceeding 10 gallons of coating in any one day

Emissions Unit ID: K043

2. Additional Terms and Conditions

2.a The requirements of this rule include compliance with OAC rule 3745-21-09(U)(2)(e)(iii) and OAC rule 3745-31-05(D).

2.b The permittee has requested a federally enforceable limitation of 255 tons OC per rolling, 365-day period from Anti-Vibration Adhesive Coating operations, emissions units: K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048 combined for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.

All of the above Anti-Vibration Adhesive Coating operations have existing records of emissions of OC, therefore it is not necessary to establish federally enforceable restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability OC limitations effectively restrict VOC emissions.

2.c The emission limitation specified by this rule is less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).

II. Operational Restrictions

1. The permittee shall operate the water wash or dry filtration system whenever this emissions unit is in operation.
2. The permittee shall not employ any primer, as applied, in excess of 6.37 lbs OC/gallon.
3. The permittee shall not employ any topcoat, as applied, in excess of 6.73 lbs OC/gallon.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
2. The permittee shall collect and record the following information each day for coating material usage in emissions unit K043:
 - a. the name and identification number for each primer and topcoat employed;
 - b. the volume, in gallons, of each primer employed;

- c. the total volume, in gallons, of all of the primers employed;
 - d. the volume, in gallons, of each topcoat employed;
 - e. the total volume, in gallons, of all of the topcoats employed;
 - f. the organic compound (OC) content of each coating (primer and topcoat), in lbs/gallon, as applied;
 - g. the OC emission rate for each coating (primer and topcoat), in lbs/day (b x f) and (d x f);
 - h. the total OC emission rate for all coatings (primers and topcoats), in lbs/day (sum of g).
3. The permittee shall collect and maintain daily records of the following information for the clean-up operations:
- a. the name and identification number of each clean-up material, employed;
 - b. the number of gallons of each clean-up material employed;
 - c. the OC content of each clean-up material, employed, in lbs/gal;
 - d. the OC input rate for clean-up material, (b) x (c), in lbs per day;
 - e. the total monthly OC emission rate for all clean-up materials employed, in tons, summation of (d).
4. In order to demonstrate compliance with the 255 tons per rolling 365-day period, the permittee shall collect and record the following each day for emission units: K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048 combined.
- a. the name and identification number of each coating and cleanup material;
 - b. the OC content of each coating and cleanup material, in lbs/gallon, as applied;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the OC emission rates from each coating and cleanup material employed (b x c); and
 - e. the total OC emission rate from all coatings and cleanup material employed, (summation

210

DTR I

PTI A₁

Issued: 8/28/2003

Emissions Unit ID: K043

of A.III.2.h and A.III.3.d); and

- f. the rolling 365-day summation of the total OC emission rate.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit deviation (excursion) reports for emissions unit K043 which identify exceedances of any of the following:
 - a. any exceedances of the coating material gallon usage restrictions for primer coating operations and topcoat operations; and
 - b. any exceedances of the 6.37 lbs OC/gallon primer or 6.73 lbs OC/gallon topcoat operational restrictions; and
 - c. any exceedances of the 0.07 ton OC/month from cleanup material limitation; and
 - d. any exceedances of the 255 tons OC per rolling, 12-month period for Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K034, K043, K046, and K048 combined.

V. Testing Requirements

1. Compliance with the emission limitations in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. **Emission Limitation**
63.70 lbs OC/day from primer coating operations

Applicable Compliance Method

The emission limitation was established by multiplying a maximum coating OC content of 6.37 lbs/gallon and a maximum coating usage rate of 10 gallons per day. Therefore, provided compliance is shown with the coating content and usage restrictions in this permit, compliance with the daily OC limitation will be assumed. Monitoring and recordkeeping of the coating OC content and daily usage are contained in sections A.III.2.f and A.III.2.c, respectively.

b. **Emission Limitation**

11.63 tons OC/year from primer coating operations

Applicable Compliance Method

The annual emission limitation for this emission unit was based on the emission unit's potential to emit.* Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was established by multiplying the lbs OC/day limitation by the maximum operating schedule of 365 days/year and dividing by 2000 lbs/ton.

c. **Emission Limitation**

67.30 lbs OC/day from topcoat operations

Applicable Compliance Method

The emission limitation was established by multiplying a maximum coating OC content of 6.73 lbs/gallon and a maximum coating usage rate of 10 gallons per day. Therefore, provided compliance is shown with the coating content and usage restrictions in this permit, compliance with the daily OC limitation will be assumed. Monitoring and recordkeeping of the coating OC content and daily usage are contained in sections A.III.2.f and A.III.2.e, respectively.

d. **Emission Limitation**

12.28 tons OC/year from topcoat operations

Applicable Compliance Method

The annual emission limitation for this emission unit was based on the emission unit's potential to emit.* Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was established by multiplying the lbs OC/day limitation by the maximum operating schedule of 365 days/year and dividing by 2000 lbs/ton.

e. **Emission Limitation**

0.07 ton OC/month, 0.87 ton OC/year from cleanup operations

Applicable Compliance Method

Compliance with this monthly limitation shall be determined by the recordkeeping in section A.III.3 of this permit. The annual limitation was established by multiplying the monthly OC cleanup limitation by a maximum operating schedule of 12 months per year. Therefore, provided compliance is demonstrated with the monthly OC cleanup limitation, compliance with the annual cleanup limitation will be assumed.

f. **Emission Limitation**

0.10 lb PE/hour, 0.44 ton PE/year

Applicable Compliance Method

Compliance with the PE limitations shall be determined in accordance with the following:

The permittee may calculate the actual PE rates utilizing the following equation:

$$E = (\text{maximum coating solids usage rate in lbs/hr}) \times (1-TE) \times (1-CE)$$

where:

E = PE rate (lbs/hr)

TE = Transfer Efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = Control Efficiency of the control equipment

If required, compliance with the PE limitations shall be based on stack testing in accordance with 40 CFR Part 60, Appendix A- Test Methods 1-5.

- g. **Emission Limitation**
Visible PE shall not exceed 0% opacity, as a six-minute average

Applicable Compliance Method

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

- h. **Emission Limitation**
255 tons OC per rolling 365-day period from all Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046 and K048 combined.

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.4. of this permit.

- i. **Emission Limitation**
VOC emission exemption, based on maximum daily coating usage for primer coating operations and topcoat operations, separately, not exceeding 10 gallons of coating in any

214

DTR Industries Inc
PTI Application: 02 12020
Issued

Facility ID: 0302000166

Emissions Unit ID: K043

one day

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.2. of this permit.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K043 - Manual adhesive spray machine (B540-1,2)-miscellaneous metal parts coating operation	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions unit K042 and K043 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: methyl isobutyl ketone
 TLV (mg/m³): 204.82

216

DTR I

PTI A₁

Issued: 8/28/2003

Emissions Unit ID: K043

Maximum Hourly Emission Rate (lbs/hr): 5.35
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 1637
MAGLC (ug/m³): 4877

Pollutant: toluene
TLV (mg/m³): 188.40
Maximum Hourly Emission Rate (lbs/hr): 7.47*
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 2297
MAGLC (ug/m³): 4486

*Combined emission rate for K042 and K043.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

Emissions Unit ID: K043

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K044 - Manual paint spray machine (B210) Modification to PTI # 03-13807 issued on 12/05/02 to increase the synthetic minor group limit from 8 TPY OC to 18 TPY OC.	OAC rule 3745-31-05 (A)(3)	Use of water wash or dry filtration system 0.35 lb organic compounds (OC)/hr, 1.53 tons OC/yr 0.08 lb particulate emissions (PE)/hr, 0.35 tons PE/yr 0% opacity as a six-minute average
	OAC rule 3745-17-07(A)	See A.I.2.a.
	OAC rule 3745-17-11(B)	See A.I.2.b.
	OAC rule 3745-21-09(U)(1)(c)	See A.I.2.b. 3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, for an extreme performance coating.
	OAC rule 3745-31-05(D)	18.0 tons OC per rolling, 365-day period, from all the emission units identified in A.I.2.c. (see Section A.I.2.c)

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with OAC rule 3745-21-09(U)(1)(c) and OAC rule 3745-31-05(D).
- 2.b The emission limit specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.c The permittee has requested a federally enforceable limitation of 18 tons OC per rolling, 365-day period from Anti-Vibration Water-Borne Painting operations, emissions units: K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.

Rolling limits for Anti-Vibration Adhesive Coating operations were established in Permit to Install (PTI) 03-13807 which was issued on December 5, 2002, and as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability OC limitations effectively restrict VOC emissions.

II. Operational Restrictions

- 1. The permittee shall operate the water wash system or the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain daily records that document any time periods when the water wash system or the dry filtration system was not in service when the emissions unit was in operation.
- 2. In order to demonstrate compliance with the 18 tons per rolling 365-day period and the 3.5 lbs VOC/gallon of coating, excluding water and exempt solvents, the permittee shall collect and record the following each day for emission units: K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined.
 - a. the name and identification number of each coating, employed;
 - b. the OC content of each coating, in lbs/gallon, as applied;
 - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gallon, [The VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{voc,2}$];

- d. the number of gallons of each coating employed;
- e. the OC emission rates from each coating employed (b x d) in lbs; and
- f. the total OC emission rate from all coatings and cleanup material employed, in lbs (summation of e); and
- g. the rolling 365-day summation of the total OC emission rate, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the water wash system or the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.
2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit deviation (excursion) reports for emissions unit K044 which identify exceedances of any of the following:
 - a. any exceedances of the 3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, content restriction; and
 - b. any exceedances of the 18 tons OC per rolling, 365-day period for Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
 - a. **Emission Limitation**
0.35 lb OC/hr and 1.53 TPY OC

Applicable Compliance Method
The hourly OC emission limitation is based on the emissions unit's potential to emit*. Therefore, no recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance. The TPY limitation was developed by multiplying the lb/hr limitation by a maximum operating schedule of 8760 hrs per year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

*The potential to emit for this emissions unit was based on a maximum hourly gallon usage of 0.35 gallons per hour and a maximum OC content of 1.01 lbs per gallon.
 - b. **Emission Limitation**
0.08 lb PE/hr and 0.35 TPY PE

Applicable Compliance Method

The permittee shall demonstrate compliance with this limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate in lbs/hr}) \times (1 - TE)(1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

TE = Transfer Efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = Control Efficiency of the control equipment

Annual emissions shall be calculated based on multiplying E by the annual operating schedule for the emissions unit and dividing by 2000 lbs per ton.

If required, compliance with the PE limitations shall be based on stack testing in accordance with 40 CFR Part 60, Appendix A- Test Methods 1-5.

- c. **Emission Limitation**
18 tons OC per rolling 365-day period from all Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined.

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.2 of this permit.

- d. **Emission Limitation**
0% opacity as a six minute average

Applicable Compliance Method

If required, compliance with the visible PE limitation shall be determined in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

- e. **Emission Limitation**
3.5 lbs VOC per gallon of coating, excluding water and exempt solvent

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.2 of this permit. Any determination of VOC content (VOC means all volatile organic compounds that in a coating material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K044 - Manual paint spray machine(B210) Modification to PTI # 03-13807 issued on 12/05/02 to increase the synthetic minor group limit from 8 TPY OC to 18 TPY OC.	See below	See below

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit K044 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application, the SCREEN 3.0 and Industrial Source Complex - Short Term III models. The predicted 1-hour maximum ground-level concentration from the use of the models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Triethylamine
TLV (mg/m³): 4.21
Maximum Hourly Emission Rate (lbs/hr): 0.95
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 87.37 *
MAGLC (ug/m³): 100.24

Pollutant: 2-Butoxyethanol
TLV (mg/m³): 98.2
Maximum Hourly Emission Rate (lbs/hr): 4.40
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 2075 **
MAGLC (ug/m³): 2338

* Based on ISCST3 model

** Based on Screen 3 model

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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

Emissions Unit ID: K044

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

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K045 - Eponics paint auto spray (B640)- miscellaneous metal parts coating operation	OAC rule 3745-31-05(A)(3)	Use of water wash or dry filtration system 0.09 lb particulate emissions (PE)/hour, 0.39 ton PE/year Visible PE shall not exceed 0% opacity, as a six-minute average 57.60 lbs organic compounds (OC)/day from coating operations 0.02 ton OC/month, 0.24 ton OC/year from cleanup materials see Section A.I.2.a.
	OAC rule 3745-17-11(B)	see Section A.I.2.b.
	OAC rule 3745-17-07(A)	see Section A.I.2.b.
	OAC rule 3745-31-05(D)	10.51 tons OC per rolling, 12-month period from K045 and K050 combined (see Section A.I.2.c.)
	OAC rule 3745-21-09(U)(2)(e)(iii)	VOC emission exemption, based on

229

DTR I

PTI A₁

Issued: 8/28/2003

Emissions Unit ID: K045

maximum daily coating
usage not exceeding 10
gallons of coating in any one
day

2. Additional Terms and Conditions

- 2.a The requirements of this rule include compliance with OAC rule 3745-21-09(U)(2)(e)(iii) and OAC rule 3745-31-05(D).
- 2.b The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.c The permittee has requested a federally enforceable limitation of 10.51 tons OC (includes emissions from coating and cleanup operations) per rolling 12-month period for emission units K045 and K050 combined for purposes of avoiding PSD applicability.

Emission units K045 and K050 have existing records of emissions of OC, therefore it is not necessary to establish federally enforceable restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability OC limitations effectively restrict VOC emissions.

II. Operational Restrictions

- 1. The permittee shall operate the water wash or dry filtration system whenever this emissions unit is in operation.
- 2. The permittee shall not employ any coating, in excess of 5.76 lbs OC/gallon as applied.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
- 2. The permittee shall collect and record the following information each day for coating material usage in emissions unit K045:
 - a. the name and identification number of each coating employed;
 - b. the volume, in gallons, of each coating employed;
 - c. the total volume, in gallons, of all coatings employed.
- 3. The permittee shall collect and record the following each month for the clean-up material usage in emissions unit K045:

- a. the name and identification number of each clean-up material, employed;
 - b. the number of gallons of each clean-up material employed;
 - c. the OC content of each clean-up material, employed, in lbs/gal;
 - d. the OC emission rate for clean-up material, (b) x (c) x 1 ton/2000 lbs, in tons per month;
 - e. the total OC emission rate for all clean-up materials employed, summation of (d), in tons per month.
4. The permit shall collect and record the following each month for emission units K045 and K050 combined:
- a. the volume, in gallons, of each coating employed;
 - b. the organic compound (OC) content of each coating, in lbs/gallon, as applied;
 - c. the OC emission rate for each coating, (b) x (c) x 1 ton/2000 lbs, in tons per month;
 - d. the total OC emission rate for all coatings, (sum of c) in tons per month; and
 - e. the total OC emission rate from all coatings and cleanup material employed, in tons per month (summation of A.III.3.e and A.III.4.d); and
 - f. the rolling 12-month summation of the monthly OC emission rates.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit deviation (excursion) reports for emissions unit K045 which identify exceedances of any of the following:
 - a. any exceedances of the coating material gallon usage restrictions for primer coating operations and topcoat operations; and
 - b. any exceedances of the 5.76 lbs OC/gallon operational restriction; and
 - c. any exceedances of the combined annual emission limitation of 10.51 tons OC per rolling,

12-month period for emissions units K045 and K050 combined; and

- d. any exceedances of the 0.02 ton OC/month from cleanup material limitation.

V. Testing Requirements

1. Compliance with the emission limitations in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. **Emission Limitation**
57.60 lbs OC/day from coating operations

Applicable Compliance Method

The emission limitation was established by multiplying a maximum coating OC content of 5.76 lbs/gallon and a maximum coating usage rate of 10 gallons per day. Therefore, provided compliance is shown with the coating content and usage restrictions in this permit, compliance with the daily OC limitation will be assumed. Monitoring and recordkeeping of the coating OC content and daily usage are contained in sections A.III.4.b and A.III.2.b, respectively.

- b. **Emission Limitation**
0.02 ton OC/month, 0.22 ton OC/year from cleanup operations

Applicable Compliance Method

Compliance with this monthly limitation shall be determined by the recordkeeping in section A.III.3 of this permit. The annual limitation was established by multiplying the monthly OC cleanup limitation by a maximum operating schedule of 12 months per year. Therefore, provided compliance is demonstrated with the monthly OC cleanup limitation, compliance with the annual cleanup limitation will be assumed.

- c. **Emission Limitation**
0.09 lb PE/hour, 0.39 ton PE/year

Applicable Compliance Method

Compliance with the PE limitations shall be determined in accordance with the following:

The permittee may calculate the actual PE rates utilizing the following equation:

$$E = (\text{maximum coating solids usage rate in lbs/hr}) \times (1-TE) \times (1-CE)$$

where:

E = PE rate (lbs/hr)

TE = Transfer Efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = Control Efficiency of the control equipment

If required, compliance with the PE limitations shall be based on stack testing in accordance with 40 CFR Part 60, Appendix A- Test Methods 1-5.

d. **Emission Limitation**

Visible PE shall not exceed 0% opacity, as a six-minute average

Applicable Compliance Method

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

e. **Emission Limitation**

10.51 tons OC per rolling, 12-month period from K045 and K050 combined.

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.4. of this permit.

f. **Emission Limitation**

VOC emission exemption, based on maximum daily coating usage not exceeding 10 gallons of coating in any one day

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.2. of this permit.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K045 - Eponics paint auto spray (B640)- miscellaneous metal parts coating operation	See below	See below

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emission unit K045 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene
 TLV (mg/m³): 188.40
 Maximum Hourly Emission Rate (lbs/hr): 2.43

235

DTR I

PTI A₁

Issued: 8/28/2003

Emissions Unit ID: K045

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 613.3
MAGLC (ug/m³): 4486

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

237

DTR Industries Inc

PTI Application: 02 12020

Issued

Facility ID: 0302000166

Emissions Unit ID: K045

IV. Reporting Requirements

None

238

DTR I

PTI A₁

Issued: 8/28/2003

Emissions Unit ID: K045

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K046 - Adhesive dipping machine (B650-1,2) miscellaneous metal parts coating operation	OAC rule 3745-31-05(A)(3)	63.70 lbs organic compounds (OC)/day, 11.63 tons OC/year from primer coating operations 67.30 lbs OC/day, 12.28 tons OC/year from topcoat coating operations 0.73 ton OC/month, 8.76 ton OC/year from cleanup materials See A.I.2.a
	OAC rule 3745-31-05(D)	255 tons OC per rolling, 365-day period, from all the emission units identified in A.I.2.b. (see Section A.I.2.b.)
	OAC rule 3745-21-09(U)(2)(e)(iii)	VOC emission exemption, based on maximum daily coating usage for primer coating operations not exceeding 10 gallons of coating in any one day, and topcoat operations not exceeding 10 gallons of coating in any one day

2. Additional Terms and Conditions

- 2.a** The requirements of this rule include compliance with OAC rule 3745-21-09(U)(2)(e)(iii) and OAC rule 3745-31-05(D).
- 2.b** The permittee has requested a federally enforceable limitation of 255 tons OC per rolling, 365-day period from Anti-Vibration Adhesive Coating operations, emissions units: K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048 combined for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.

All of the above Anti-Vibration Adhesive Coating operations have existing records of emissions of OC, therefore it is not necessary to establish federally enforceable restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability OC limitations effectively restrict VOC emissions.

II. Operational Restrictions

1. The permittee shall not employ any primer, as applied, in excess of 6.37 lbs OC/gallon.
2. The permittee shall not employ any topcoat, as applied, in excess of 6.73 lbs OC/gallon.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for coating material usage in emissions unit K046:
 - a. the name and identification number for each primer and topcoat employed;
 - b. the volume, in gallons, of each primer employed;
 - c. the total volume, in gallons, of all of the primers employed;
 - d. the volume, in gallons, of each topcoat employed;
 - e. the total volume, in gallons, of all of the topcoats employed;
 - f. the organic compound (OC) content of each coating (primer and topcoat), in lbs/gallon, as applied;
 - g. the OC emission rate for each coating (primer and topcoat), in lbs/day (b x f) and (d x f);

Emissions Unit ID: K046

- h. the total OC emission rate for all coatings (primers and topcoats), in lbs/day (sum of g).
2. The permittee shall collect and maintain daily records of the following information for the clean-up operations:
 - a. the name and identification number of each clean-up material, employed;
 - b. the number of gallons of each clean-up material employed;
 - c. the OC content of each clean-up material, employed, in lbs/gal;
 - d. the OC input rate for clean-up material, (b) x (c), in lbs per day;
 - e. the total monthly OC emission rate for all clean-up materials employed, in tons, summation of (d).
3. In order to demonstrate compliance with the 255 tons per rolling 365-day period, the permittee shall collect and record the following each day for emission units: K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048 combined.
 - a. the name and identification number of each coating and cleanup material;
 - b. the OC content of each coating and cleanup material, in lbs/gallon, as applied;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the OC emission rates from each coating and cleanup material employed (b x c); and
 - e. the total OC emission rate from all coatings and cleanup material employed, (summation of A.III.1.h and A.III.2.d); and
 - f. the rolling 365-day summation of the total OC emission rate.

IV. Reporting Requirements

1. In accordance with the General Terms and Conditions of this permit, the permittee shall submit deviation (excursion) reports for emissions unit K046 which identify exceedances of any of the following:
 - a. any exceedances of the coating material gallon usage restrictions for primer coating operations and topcoat operations; and
 - b. any exceedances of the 6.37 lbs OC/gallon primer or 6.73 lbs OC/gallon topcoat operational restrictions; and
 - c. any exceedances of the 0.73 ton OC/month from cleanup material limitation; and

- d. any exceedances of the 255 tons OC per rolling, 12-month period for Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K034, K043, K046, and K048 combined.

V. Testing Requirements

1. Compliance with the emission limitations in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. **Emission Limitation**
63.70 lbs OC/day from primer coating operations

Applicable Compliance Method

The emission limitation was established by multiplying a maximum coating OC content of 6.37 lbs/gallon and a maximum coating usage rate of 10 gallons per day. Therefore, provided compliance is shown with the coating content and usage restrictions in this permit, compliance with the daily OC limitation will be assumed. Monitoring and recordkeeping of the coating OC content and daily usage are contained in sections A.III.1.f and A.III.1.c, respectively.

- b. **Emission Limitation**
11.63 tons OC/year from primer coating operations

Applicable Compliance Method

The annual emission limitation for this emission unit was based on the emission unit's potential to emit.* Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was established by multiplying the lbs OC/day limitation by the maximum operating schedule of 365 days/year and dividing by 2000 lbs/ton.

- c. **Emission Limitation**
67.30 lbs OC/day from topcoat operations

Applicable Compliance Method

The emission limitation was established by multiplying a maximum coating OC content of 6.73 lbs/gallon and a maximum coating usage rate of 10 gallons per day. Therefore,

Emissions Unit ID: K046

provided compliance is shown with the coating content and usage restrictions in this permit, compliance with the daily OC limitation will be assumed. Monitoring and recordkeeping of the coating OC content and daily usage are contained in sections A.III.1.f and A.III.1.e, respectively.

- d. **Emission Limitation**
12.28 tons OC/year from topcoat operations

Applicable Compliance Method

The annual emission limitation for this emission unit was based on the emission unit's potential to emit.* Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was established by multiplying the lbs OC/day limitation by the maximum operating schedule of 365 days/year and dividing by 2000 lbs/ton.

- e. **Emission Limitation**
0.73 ton OC/month, 8.76 ton OC/year from cleanup operations

Applicable Compliance Method

Compliance with this monthly limitation shall be determined by the recordkeeping in section A.III.2 of this permit. The annual limitation was established by multiplying the monthly OC cleanup limitation by a maximum operating schedule of 12 months per year. Therefore, provided compliance is demonstrated with the monthly OC cleanup limitation, compliance with the annual cleanup limitation will be assumed.

- f. **Emission Limitation**
255 tons OC per rolling 365-day period from all Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046 and K048 combined.

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.3. of this permit.

- g. **Emission Limitation**
VOC emission exemption, based on maximum daily coating usage for primer coating operations and topcoat operations, separately, not exceeding 10 gallons of coating in any one day

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.1. of this permit.

244

DTR I

PTI A₁

Issued: 8/28/2003

Emissions Unit ID: K046

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K046 - Adhesive dipping machine (B650-1,2)-miscellaneous metal parts coating operation	See below	See below

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions units K046 and K048 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: methyl isobutyl ketone
 TLV (mg/m³): 204.82

246

DTR Industries Inc

PTI Application: 02 12020

Issued

Facility ID: 0302000166

Emissions Unit ID: K046

Maximum Hourly Emission Rate (lbs/hr): 10.19 *

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 2832

MAGLC (ug/m3): 4877

Pollutant: toluene
TLV (mg/m³): 188.40
Maximum Hourly Emission Rate (lbs/hr): 11.49 *
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 3208
MAGLC (ug/m³): 4486

* Combined emission rates for K046 and K048.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K048 - Adhesive dip machine (B657-1,2) miscellaneous metal parts coating operation	OAC rule 3745-31-05(A)(3)	63.70 lbs organic compounds (OC)/day, 11.63 tons OC/year from primer coating operations 65.70 lbs OC/day, 11.99 tons OC/year from topcoat coating operations 0.73 ton OC/month, 8.76 ton OC/year from cleanup materials See A.I.2.a
	OAC rule 3745-31-05(D)	255 tons OC per rolling, 365-day period, from all the emission units identified in A.I.2.b. (see Section A.I.2.b.)
	OAC rule 3745-21-09(U)(2)(e)(iii)	VOC emission exemption, based on maximum daily coating usage for primer coating operations not exceeding 10 gallons of coating in any one day, and topcoat operations not exceeding 10 gallons of coating in any one day

2. Additional Terms and Conditions

Emissions Unit ID: K048

- 2.a** The requirements of this rule include compliance with OAC rule 3745-21-09(U)(2)(e)(iii) and OAC rule 3745-31-05(D).
- 2.b** The permittee has requested a federally enforceable limitation of 255 tons OC per rolling, 365-day period from Anti-Vibration Adhesive Coating operations, emissions units: K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048 combined for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.

All of the above Anti-Vibration Adhesive Coating operations have existing records of emissions of OC, therefore it is not necessary to establish federally enforceable restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability OC limitations effectively restrict VOC emissions.

II. Operational Restrictions

1. The permittee shall not employ any primer, as applied, in excess of 6.37 lbs OC/gallon.
2. The permittee shall not employ any topcoat, as applied, in excess of 6.57 lbs OC/gallon.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for coating material usage in emissions unit K048:
 - a. the name and identification number for each primer and topcoat employed;
 - b. the volume, in gallons, of each primer employed;
 - c. the total volume, in gallons, of all of the primers employed;
 - d. the volume, in gallons, of each topcoat employed;
 - e. the total volume, in gallons, of all of the topcoats employed;
 - f. the organic compound (OC) content of each coating (primer and topcoat), in lbs/gallon, as applied;
 - g. the OC emission rate for each coating (primer and topcoat), in lbs/day (b x f) and (d x f);
 - h. the total OC emission rate for all coatings (primers and topcoats), in lbs/day (sum of g).
2. The permittee shall collect and maintain daily records of the following information for the clean-up operations:
 - a. the name and identification number of each clean-up material, employed;

- b. the number of gallons of each clean-up material employed;
 - c. the OC content of each clean-up material, employed, in lbs/gal;
 - d. the OC input rate for clean-up material, (b) x (c), in lbs per day;
 - e. the total monthly OC emission rate for all clean-up materials employed, in tons, summation of (d).
3. In order to demonstrate compliance with the 255 tons per rolling 365-day period, the permittee shall collect and record the following each day for emission units: K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046, and K048 combined.
- a. the name and identification number of each coating and cleanup material;
 - b. the OC content of each coating and cleanup material, in lbs/gallon, as applied;
 - c. the number of gallons of each coating and cleanup material employed;
 - d. the OC emission rates from each coating and cleanup material employed (b x c); and
 - e. the total OC emission rate from all coatings and cleanup material employed, (summation of A.III.1.h and A.III.2.d); and
 - f. the rolling 365-day summation of the total OC emission rate.

IV. Reporting Requirements

1. In accordance with the General Terms and Conditions of this permit, the permittee shall submit deviation (excursion) reports for emissions unit K048 which identify exceedances of any of the following:
 - a. any exceedances of the coating material gallon usage restrictions for primer coating operations and topcoat operations; and
 - b. any exceedances of the 6.37 lbs OC/gallon primer or 6.57 lbs OC/gallon topcoat operational restrictions; and
 - c. any exceedances of the 0.73 ton OC/month from cleanup material limitation; and

- d. any exceedances of the 255 tons OC per rolling, 12-month period for Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K034, K043, K046, and K048 combined.

V. Testing Requirements

1. Compliance with the emission limitations in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. **Emission Limitation**
63.70 lbs OC/day from primer coating operations

Applicable Compliance Method

The emission limitation was established by multiplying a maximum coating OC content of 6.37 lbs/gallon and a maximum coating usage rate of 10 gallons per day. Therefore, provided compliance is shown with the coating content and usage restrictions in this permit, compliance with the daily OC limitation will be assumed. Monitoring and recordkeeping of the coating OC content and daily usage are contained in sections A.III.1.f and A.III.1.c, respectively.

- b. **Emission Limitation**
11.63 tons OC/year from primer coating operations

Applicable Compliance Method

The annual emission limitation for this emission unit was based on the emission unit's potential to emit.* Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was established by multiplying the lbs OC/day limitation by the maximum operating schedule of 365 days/year and dividing by 2000 lbs/ton.

- c. **Emission Limitation**
65.70 lbs OC/day from topcoat operations

Applicable Compliance Method

The emission limitation was established by multiplying a maximum coating OC content of 6.57 lbs/gallon and a maximum coating usage rate of 10 gallons per day. Therefore, provided compliance is shown with the coating content and usage restrictions in this permit, compliance with the daily OC limitation will be assumed. Monitoring and recordkeeping of the coating OC content and daily usage are contained in sections A.III.1.f and A.III.1.e, respectively.

- d. **Emission Limitation**

11.99 tons OC/year from topcoat operations

Applicable Compliance Method

The annual emission limitation for this emission unit was based on the emission unit's potential to emit.* Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was established by multiplying the lbs OC/day limitation by the maximum operating schedule of 365 days/year and dividing by 2000 lbs/ton.

e. **Emission Limitation**

0.73 ton OC/month, 8.76 ton OC/year from cleanup operations

Applicable Compliance Method

Compliance with this monthly limitation shall be determined by the recordkeeping in section A.III.2 of this permit. The annual limitation was established by multiplying the monthly OC cleanup limitation by a maximum operating schedule of 12 months per year. Therefore, provided compliance is demonstrated with the monthly OC cleanup limitation, compliance with the annual cleanup limitation will be assumed.

f. **Emission Limitation**

255 tons OC per rolling 365-day period from all Anti-Vibration Adhesive Coating operations, emissions units K004, K009, K011, K013, K016, K017, K018, K030, K031, K032, K033, K043, K046 and K048 combined.

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.3. of this permit.

g. **Emission Limitation**

VOC emission exemption, based on maximum daily coating usage for primer coating operations and topcoat operations, separately, not exceeding 10 gallons of coating in any one day

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.1. of this permit.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K048 - Adhesive dip machine (B657-1,2) miscellaneous metal parts coating operation	See below	See below

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions units K046 and K048 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: methyl isobutyl ketone
TLV (mg/m³): 204.82

255

DTR Industries Inc

PTI Application: 02 12020

Issued

Facility ID: 0302000166

Emissions Unit ID: K048

Maximum Hourly Emission Rate (lbs/hr): 10.19 *

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 2832

MAGLC (ug/m3): 4880.95

Pollutant: toluene
TLV (mg/m³): 188.40
Maximum Hourly Emission Rate (lbs/hr): 11.49 *
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 3208
MAGLC (ug/m³): 4476.19

* Combined emission rates for K046 and K048.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K050 - Eponics paint auto spray (B792) miscellaneous metal parts coating operation (modification to PTI 03-13641, issued 7/17/01). (Modification to establish a new synthetic minor group limit of 10.51 TPY OC)	OAC rule 3745-31-05(A)(3)	Use of water wash or dry filtration system 0.09 lb particulate emissions (PE)/hour, 0.39 ton PE/year Visible PE shall not exceed 0% opacity, as a six-minute average 57.60 lbs organic compounds (OC)/day from coating operations 0.02 ton OC/month, 0.24 ton OC/year from cleanup materials see Section A.I.2.a.
	OAC rule 3745-17-11(B)	see Section A.I.2.b.
	OAC rule 3745-17-07(A)	see Section A.I.2.b.
	OAC rule 3745-31-05(D)	10.51 tons OC per rolling, 12-month period from K045 and K050 combined (see Section A.I.2.c.)
	OAC rule 3745-21-09(U)(2)(e)(iii)	VOC emission exemption, based on maximum daily coating usage not exceeding 10 gallons of coating in any one day

2. Additional Terms and Conditions

- 2.a The requirements of this rule include compliance with OAC rule 3745-21-09(U)(2)(e)(iii) and OAC rule 3745-31-05(D).
- 2.b The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.c The permittee has requested a federally enforceable limitation of 10.51 tons OC (includes emissions from coating and cleanup operations) per rolling 12-month period for emission units K045 and K050 combined for purposes of avoiding PSD applicability.

Emission units K045 and K050 have existing records of emissions of OC, therefore it is not necessary to establish federally enforceable restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability OC limitations effectively restrict VOC emissions.

II. Operational Restrictions

- 1. The permittee shall operate the water wash or dry filtration system whenever this emissions unit is in operation.
- 2. The permittee shall not employ any coating, in excess of 5.76 lbs OC/gallon as applied.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain daily records that document any time periods when the water wash or dry filtration system was not in service when the emissions unit was in operation.
- 2. The permittee shall collect and record the following information each day for coating material usage in emissions unit K050:
 - a. the name and identification number of each coating employed;
 - b. the volume, in gallons, of each coating employed;
 - c. the total volume, in gallons, of all coatings employed.
- 3. The permittee shall collect and record the following each month for the clean-up material usage in emissions unit K050:

- a. the name and identification number of each clean-up material, employed;
 - b. the number of gallons of each clean-up material employed;
 - c. the OC content of each clean-up material, employed, in lbs/gal;
 - d. the OC emission rate for clean-up material, (b) x (c) x 1 ton/2000 lbs, in tons per month;
 - e. the total OC emission rate for all clean-up materials employed, summation of (d), in tons per month.
4. The permit shall collect and record the following each month for emission units K045 and K050 combined:
- a. the volume, in gallons, of each coating employed;
 - b. the organic compound (OC) content of each coating, in lbs/gallon, as applied;
 - c. the OC emission rate for each coating, (b) x (c) x 1 ton/2000 lbs, in tons per month;
 - d. the total OC emission rate for all coatings, (sum of c) in tons per month; and
 - e. the total OC emission rate from all coatings and cleanup material employed, in tons per month (summation of A.III.3.e and A.III.4.d); and
 - f. the rolling 12-month summation of the monthly OC emission rates.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the water wash or dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit deviation (excursion) reports for emissions unit K050 which identify exceedances of any of the following:

Emissions Unit ID: K050

- a. any exceedances of the coating material gallon usage restrictions for primer coating operations and topcoat operations; and
- b. any exceedances of the 5.76 lbs OC/gallon operational restriction; and
- c. any exceedances of the combined annual emission limitation of 10.51 tons OC per rolling, 12-month period for emissions units K045 and K050 combined; and
- d. any exceedances of the 0.02 ton OC/month from cleanup material limitation.

V. Testing Requirements

1. Compliance with the emission limitations in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. **Emission Limitation**
57.60 lbs OC/day from coating operations

Applicable Compliance Method

The emission limitation was established by multiplying a maximum coating OC content of 5.76 lbs/gallon and a maximum coating usage rate of 10 gallons per day. Therefore, provided compliance is shown with the coating content and usage restrictions in this permit, compliance with the daily OC limitation will be assumed. Monitoring and recordkeeping of the coating OC content and daily usage are contained in sections A.III.4.b and A.III.2.b, respectively.

- b. **Emission Limitation**
0.02 ton OC/month, 0.24 ton OC/year from cleanup operations

Applicable Compliance Method

Compliance with this monthly limitation shall be determined by the recordkeeping in section A.III.3 of this permit. The annual limitation was established by multiplying the monthly OC cleanup limitation by a maximum operating schedule of 12 months per year. Therefore, provided compliance is demonstrated with the monthly OC cleanup limitation, compliance with the annual cleanup limitation will be assumed.

- c. **Emission Limitation**
0.09 lb PE/hour, 0.39 ton PE/year

Applicable Compliance Method

Compliance with the PE limitations shall be determined in accordance with the following:

The permittee may calculate the actual PE rates utilizing the following equation:

$$E = (\text{maximum coating solids usage rate in lbs/hr}) \times (1-TE) \times (1-CE)$$

where:

E = PE rate (lbs/hr)

TE = Transfer Efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = Control Efficiency of the control equipment

If required, compliance with the PE limitations shall be based on stack testing in accordance with 40 CFR Part 60, Appendix A- Test Methods 1-5.

d. **Emission Limitation**

Visible PE shall not exceed 0% opacity, as a six-minute average

Applicable Compliance Method

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

e. **Emission Limitation**

10.51 tons OC per rolling, 12-month period from K045 and K050 combined.

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.4. of this permit.

f. **Emission Limitation**

VOC emission exemption, based on maximum daily coating usage not exceeding 10 gallons of coating in any one day

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.2. of this permit.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K050 - Eponics paint auto spray (B792) miscellaneous metal parts coating operation	See below	See below

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emission unit K050 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene
 TLV (mg/m3): 188.40
 Maximum Hourly Emission Rate (lbs/hr): 2.43
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 613.3
 MAGLC (ug/m3): 4486

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

265

DTR Industries Inc

PTI Application: **02 12020**

Issued

Facility ID: **0302000166**

Emissions Unit ID: K050

IV. Reporting Requirements

None

266

DTR I

PTI A₁

Issued: 8/28/2003

Emissions Unit ID: K050

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K051 - Paint spray machine No. 9 (auto spray)(B864)	OAC rule 3745-31-05 (A)(3)	Use of water wash or dry filtration system 0.83 lb organic compounds (OC)/hr, 3.64 tons OC/yr 0.17 lb particulate emissions (PE)/hr, 0.74 tons PE/yr 0% opacity as a six-minute average See A.I.2.a.
	OAC rule 3745-17-07(A)	See A.I.2.b.
	OAC rule 3745-17-11(B)	See A.I.2.b.
	OAC rule 3745-21-09(U)(1)(c)	3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, for an extreme performance coating.
	OAC rule 3745-31-05(D)	18.0 tons OC per rolling, 365-day period, from all the emission units identified in A.I.2.c. (see Section A.I.2.c)

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with OAC rule 3745-21-09(U)(1)(c) and OAC rule 3745-31-05(D).
- 2.b The emission limit specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.c The permittee has requested a federally enforceable limitation of 18 tons OC per rolling, 365-day period from Anti-Vibration Water-Borne Painting operations, emissions units: K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.

All of the above Anti-Vibration Water-Borne Painting operations have existing records of emissions of OC, therefore it is not necessary to establish federally enforceable restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability OC limitations effectively restrict VOC emissions.

II. Operational Restrictions

- 1. The permittee shall operate the water wash system or the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain daily records that document any time periods when the water wash system or the dry filtration system was not in service when the emissions unit was in operation.
- 2. In order to demonstrate compliance with the 18 tons per rolling 365-day period and the 3.5 lbs VOC/gallon of coating, excluding water and exempt solvents, the permittee shall collect and record the following each day for emission units: K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined.
 - a. the name and identification number of each coating, employed;
 - b. the OC content of each coating, in lbs/gallon, as applied;
 - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gallon, [The VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{\text{voc},2}$];

- d. the number of gallons of each coating employed;
- e. the OC emission rates from each coating employed (b x d) in lbs; and
- f. the total OC emission rate from all coatings and cleanup material employed, in lbs (summation of e); and
- g. the rolling 365-day summation of the total OC emission rate, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the water wash system or the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.
2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit deviation (excursion) reports for emissions unit K051 which identify exceedances of any of the following:
 - a. any exceedances of the 3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, content restriction; and
 - b. any exceedances of the 18 tons OC per rolling, 365-day period for Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
 - a. **Emission Limitation**
0.83 lb OC/hr and 3.64 TPY OC

Applicable Compliance Method

The hourly OC emission limitation is based on the emissions unit's potential to emit*. Therefore, no recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance. The TPY limitation was developed by multiplying

Emissions Unit ID: K051

the lb/hr limitation by a maximum operating schedule of 8760 hrs per year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

*The potential to emit for this emissions unit was based on a maximum hourly gallon usage of 0.82 gallons per hour and a maximum OC content of 1.01 lbs per gallon.

- b. **Emission Limitation**
 0.17 lb PE/hr and 0.74 TPY PE

Applicable Compliance Method

The permittee shall demonstrate compliance with this limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate in lbs/hr}) \times (1 - TE)(1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

TE = Transfer Efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = Control Efficiency of the control equipment

Annual emissions shall be calculated based on multiplying E by the annual operating schedule for the emissions unit and dividing by 2000 lbs per ton.

If required, compliance with the PE limitations shall be based on stack testing in accordance with 40 CFR Part 60, Appendix A- Test Methods 1-5.

- c. **Emission Limitation**
 18 tons OC per rolling 365-day period from all Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined.

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.2 of this permit.

- d. **Emission Limitation**
 0% opacity as a six minute average

Applicable Compliance Method

If required, compliance with the visible PE limitation shall be determined in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

271

DTR I

PTI A₁

Issued: 8/28/2003

Emissions Unit ID: K051

- e. **Emission Limitation**
3.5 lbs VOC per gallon of coating, excluding water and exempt solvent

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.2 of this permit. Any determination of VOC content (VOC means all volatile organic compounds that in a coating material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K051 - Paint spray machine 9 (auto spray)(B864)	See below	See below

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions units K051, K052 and K053 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application, the SCREEN 3.0 and Industrial Source Complex - Short Term III models. The predicted 1-hour maximum ground-level concentration from the use of the models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Triethylamine
 TLV (mg/m3): 4.14
 Maximum Hourly Emission Rate (lbs/hr): 0.41
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 40.9 *
 MAGLC (ug/m3): 98.54

Pollutant: 2-Butoxyethanol
TLV (mg/m³): 96.66
Maximum Hourly Emission Rate (lbs/hr): 1.90
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 190.5*
MAGLC (ug/m³): 2301

* Combined emission rates for K051, K052, and K053

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

Emissions Unit ID: K051

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K052 - Paint spray machine No. 10 (auto spray)(B873)	OAC rule 3745-31-05 (A)(3)	Use of water wash or dry filtration system 0.83 lb organic compounds (OC)/hr, 3.64 tons OC/yr 0.17 lb particulate emissions (PE)/hr, 0.74 tons PE/yr 0% opacity as a six-minute average
	OAC rule 3745-17-07(A)	See A.I.2.a.
	OAC rule 3745-17-11(B)	See A.I.2.b.
	OAC rule 3745-21-09(U)(1)(c)	See A.I.2.b. 3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, for an extreme performance coating.
	OAC rule 3745-31-05(D)	18.0 tons OC per rolling, 365-day period, from all the emission units identified in A.I.2.c. (see Section A.I.2.c)

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with OAC rule 3745-21-09(U)(1)(c) and OAC rule 3745-31-05(D).
- 2.b The emission limit specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.c The permittee has requested a federally enforceable limitation of 18 tons OC per rolling, 365-day period from Anti-Vibration Water-Borne Painting operations, emissions units: K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.

All of the above Anti-Vibration Water-Borne Painting operations have existing records of emissions of OC, therefore it is not necessary to establish federally enforceable restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability OC limitations effectively restrict VOC emissions.

II. Operational Restrictions

- 1. The permittee shall operate the water wash system or the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain daily records that document any time periods when the water wash system or the dry filtration system was not in service when the emissions unit was in operation.
- 2. In order to demonstrate compliance with the 18 tons per rolling 365-day period and the 3.5 lbs VOC/gallon of coating, excluding water and exempt solvents, the permittee shall collect and record the following each day for emission units: K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined.
 - a. the name and identification number of each coating, employed;
 - b. the OC content of each coating, in lbs/gallon, as applied;
 - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gallon, [The VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{\text{voc},2}$];

- d. the number of gallons of each coating employed;
- e. the OC emission rates from each coating employed (b x d) in lbs; and
- f. the total OC emission rate from all coatings and cleanup material employed, in lbs (summation of e); and
- g. the rolling 365-day summation of the total OC emission rate, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the water wash system or the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.
2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit deviation (excursion) reports for emissions unit K052 which identify exceedances of any of the following:
 - a. any exceedances of the 3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, content restriction; and
 - b. any exceedances of the 18 tons OC per rolling, 365-day period for Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
 - a. **Emission Limitation**
0.83 lb OC/hr and 3.64 TPY OC

Applicable Compliance Method

The hourly OC emission limitation is based on the emissions unit's potential to emit*. Therefore, no recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance. The TPY limitation was developed by multiplying

Emissions Unit ID: K052

the lb/hr limitation by a maximum operating schedule of 8760 hrs per year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

*The potential to emit for this emissions unit was based on a maximum hourly gallon usage of 0.82 gallons per hour and a maximum OC content of 1.01 lbs per gallon.

- b. **Emission Limitation**
 0.17 lb PE/hr and 0.74 TPY PE

Applicable Compliance Method

The permittee shall demonstrate compliance with this limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate in lbs/hr}) \times (1 - TE)(1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

TE = Transfer Efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = Control Efficiency of the control equipment

Annual emissions shall be calculated based on multiplying E by the annual operating schedule for the emissions unit and dividing by 2000 lbs per ton.

If required, compliance with the PE limitations shall be based on stack testing in accordance with 40 CFR Part 60, Appendix A- Test Methods 1-5.

- c. **Emission Limitation**
 18 tons OC per rolling 365-day period from all Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined.

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.2 of this permit.

- d. **Emission Limitation**
 0% opacity as a six minute average

Applicable Compliance Method

If required, compliance with the visible PE limitation shall be determined in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

- e. **Emission Limitation**
3.5 lbs VOC per gallon of coating, excluding water and exempt solvent

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.2 of this permit. Any determination of VOC content (VOC means all volatile organic compounds that in a coating material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K052 - Paint spray machine 10 (auto spray)(B873)	See below	See below

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions units K051, K052 and K053 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application, the SCREEN 3.0 and Industrial Source Complex - Short Term III models. The predicted 1-hour maximum ground-level concentration from the use of the models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Triethylamine
 TLV (mg/m3): 4.14
 Maximum Hourly Emission Rate (lbs/hr): 0.41
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 40.9 *
 MAGLC (ug/m3): 98.54

Pollutant: 2-Butoxyethanol
 TLV (mg/m3): 96.66
 Maximum Hourly Emission Rate (lbs/hr): 1.90

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 190.5*
MAGLC (ug/m³): 2301

* Combined emission rates for K051, K052, and K053

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

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

Emissions Unit ID: K052

- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

283

DTR I

PTI A₁

Issued: 8/28/2003

Emissions Unit ID: K052

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K053 - Paint spray machine No.11 (auto spray)(B881)	OAC rule 3745-31-05 (A)(3)	Use of water wash or dry filtration system 0.63 lb organic compounds (OC)/hr, 2.76 tons OC/yr 0.13 lb particulate emissions (PE)/hr, 0.57 tons PE/yr 0% opacity as a six-minute average
	OAC rule 3745-17-07(A)	See A.I.2.a.
	OAC rule 3745-17-11(B)	See A.I.2.b.
	OAC rule 3745-21-09(U)(1)(c)	3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, for an extreme performance coating.
	OAC rule 3745-31-05(D)	18.0 tons OC per rolling, 365-day period, from all the emission units identified in A.I.2.c. (see Section A.I.2.c)

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with OAC rule 3745-21-09(U)(1)(c) and OAC rule 3745-31-05(D).
- 2.b The emission limit specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.c The permittee has requested a federally enforceable limitation of 18 tons OC per rolling, 365-day period from Anti-Vibration Water-Borne Painting operations, emissions units: K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined for purposes of avoiding "Prevention of Significant Deterioration" (PSD) applicability.

All of the above Anti-Vibration Water-Borne Painting operations have existing records of emissions of OC, therefore it is not necessary to establish federally enforceable restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability OC limitations effectively restrict VOC emissions.

II. Operational Restrictions

- 1. The permittee shall operate the water wash system or the dry filtration system whenever this emissions unit is in operation.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain daily records that document any time periods when the water wash system or the dry filtration system was not in service when the emissions unit was in operation.
- 2. In order to demonstrate compliance with the 18 tons per rolling 365-day period and the 3.5 lbs VOC/gallon of coating, excluding water and exempt solvents, the permittee shall collect and record the following each day for emission units: K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined.
 - a. the name and identification number of each coating, employed;
 - b. the OC content of each coating, in lbs/gallon, as applied;
 - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gallon, [The VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{\text{voc},2}$];

- d. the number of gallons of each coating employed;
- e. the OC emission rates from each coating employed (b x d) in lbs; and
- f. the total OC emission rate from all coatings and cleanup material employed, in lbs (summation of e); and
- g. the rolling 365-day summation of the total OC emission rate, in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the water wash system or the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the event occurs.
2. In accordance with the General Terms and Conditions of this permit, the permittee shall submit deviation (excursion) reports for emissions unit K053 which identify exceedances of any of the following:
 - a. any exceedances of the 3.5 lbs VOC per gallon of coating, excluding water and exempt solvents, content restriction; and
 - b. any exceedances of the 18 tons OC per rolling, 365-day period for Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
 - a. **Emission Limitation**
0.63 lb OC/hr and 2.76 TPY OC

Applicable Compliance Method

The hourly OC emission limitation is based on the emissions unit's potential to emit*. Therefore, no recordkeeping, deviation reporting or compliance method calculations are required to demonstrate compliance. The TPY limitation was developed by multiplying

Emissions Unit ID: K053

the lb/hr limitation by a maximum operating schedule of 8760 hrs per year and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

*The potential to emit for this emissions unit was based on a maximum hourly gallon usage of 0.62 gallons per hour and a maximum OC content of 1.01 lbs per gallon.

- b. **Emission Limitation**
 0.13 lb PE/hr and 0.57 TPY PE

Applicable Compliance Method

The permittee shall demonstrate compliance with this limitation by utilizing the following equation:

$$E = (\text{maximum coating solids usage rate in lbs/hr}) \times (1 - TE)(1 - CE)$$

where:

$$E = \text{PE rate (lbs/hr)}$$

TE = Transfer Efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = Control Efficiency of the control equipment

Annual emissions shall be calculated based on multiplying E by the annual operating schedule for the emissions unit and dividing by 2000 lbs per ton.

If required, compliance with the PE limitations shall be based on stack testing in accordance with 40 CFR Part 60, Appendix A- Test Methods 1-5.

- c. **Emission Limitation**
 18 tons OC per rolling 365-day period from all Anti-Vibration Water-Borne Painting operations, emissions units K006, K019, K023, K026, K035, K036, K041, K044, K051, K052 and K053 combined.

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.2 of this permit.

- d. **Emission Limitation**
 0% opacity as a six minute average

Applicable Compliance Method

If required, compliance with the visible PE limitation shall be determined in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

- e. **Emission Limitation**
3.5 lbs VOC per gallon of coating, excluding water and exempt solvent

Applicable Compliance Method

Compliance with this limitation shall be determined by recordkeeping in section A.III.2 of this permit. Any determination of VOC content (VOC means all volatile organic compounds that in a coating material expressed in pounds of VOC per gallon excluding water and exempt solvents), solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as received, by Reference Method 24. The Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the VOC content of coating materials by Reference Method 24 or an equivalent or alternative method.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K053 - Paint spray machine 11 (auto spray)(B881)	See below	See below

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions units K051, K052 and K053 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application, the SCREEN 3.0 and Industrial Source Complex - Short Term III models. The predicted 1-hour maximum ground-level concentration from the use of the models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Triethylamine
 TLV (mg/m3): 4.14
 Maximum Hourly Emission Rate (lbs/hr): 0.41
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 40.9 *
 MAGLC (ug/m3): 98.54

Pollutant: 2-Butoxyethanol
 TLV (mg/m3): 96.66
 Maximum Hourly Emission Rate (lbs/hr): 1.90

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 190.5*
MAGLC (ug/m³): 2301

* Combined emission rates for K051, K052, and K053

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

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

Emissions Unit ID: K053

- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

292

DTR I

PTI A₁

Issued: 8/28/2003

Emissions Unit ID: K053

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P046 - Glycol dip tank no.1 with (2 steam clean systems (B309) (modification to PTI 03-10256, issued 3/1/01). Modification to increase synthetic minor group limit from 15.6 TPY OC to 33 TPY OC.)	OAC rule 3745-31-05(A)(3)	0.80 lbs OC/hr; 3.50 tons OC/yr
	OAC rule 3745-31-05(D)	33 tons OC per rolling, 12-month period from all emission units identified in A.I.2.a (see A.I.2.a)
	OAC rule 3745-21-07(G)	None (see A.II.1.)

2. Additional Terms and Conditions

- 2.a The permittee has requested a federally enforceable limitation of 33 tons OC per rolling, 12-month period from Anti-Vibration Glycol Dipping Process Operations, emission units: P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined for purposes of avoiding PSD applicability.

Rolling limits for Anti-Vibration Glycol Dipping Process Operations were established in Permit to Install (PTI) 03-10256 which was issued on March 1, 2001 and, as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability OC limitations effectively restrict VOC emissions.

- 2.b BAT requirements also include compliance with the terms and conditions of this permit.

II. Operational Restrictions

294

DTR I

PTI A₁

Issued: 8/28/2003

Emissions Unit ID: P046

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

Issued: 8/28/2003

2. The maximum annual production of liquid filled engine mounts for Anti-Vibration Glycol Dipping Process operations, emission units: P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 shall not exceed 9,166,666 units per year, based upon a rolling, 12-month summation of the production rates for these emissions units.

Rolling limits for Anti-Vibration Glycol Dipping Process Operations were established in Permit to Install (PTI) 03-10256 which was issued on March 1, 2001 and, as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability OC limitations effectively restrict VOC emissions.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following each month for emissions unit P046:
 - a. the production rate; and
 - b. the calculated OC emissions, in lbs or tons using the following equation:
$$\text{OC emissions} = (\text{units produced/month}) \times (0.0072 \text{ pound OC/unit produced})$$
2. The permittee shall collect and record the following each month for Anti-Vibration Glycol Dipping Process Operations, emission units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined:
 - a. the total production rate; and
 - b. the total OC emissions, in tons; and
 - c. the rolling 12-month summation of monthly OC emission rates, in tons.
3. The permittee shall maintain records of the following information for this emissions unit:
 - a. the company identification for each liquid organic material employed in this emissions unit; and
 - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month production rate limitation and the 12-month OC emission limitation for Anti-Vibrations Glycol Dipping Process Operations from emission units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined. The deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of photochemically reactive materials. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

V. Testing Requirements

1. Compliance with the emission limitation(s) in section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- a. **Emission Limitation**
0.80 lb OC/hour

Applicable Compliance Method

The hourly emission limitation for this emission unit is based on the emission unit's potential to emit.* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was based on multiplying the maximum production rate of 110 units produced/hour by an emission factor of 0.0072 lb OC/unit produced. The emission factor was derived from stack testing a similar emissions unit on March 12, 1997.

- b. **Emission Limitation**
3.50 tons OC/year

Applicable Compliance Method

The non-combined annual emission limitation for this emission unit was based on the emission unit's potential to emit.* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was based on multiplying the maximum lbs OC/hour emitted by 8760 hours/year and dividing by 2000 lbs/ton.

- c. **Emission Limitation**
33 tons OC per rolling 12-month period from all Anti-Vibration Glycol Dipping Process Operations which include emission units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined.

297

DTR I

PTI A₁

Issued: 8/28/2003

Emissions Unit ID: P046

Applicable Compliance Method

Compliance shall be based upon the recordkeeping specified in section A.III.2 above.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P046 - Glycol dip tank no.1 with (2) steam clean systems (B309) (modification to PTI 03-10256, issued 3/1/01). Modification to increase synthetic minor group limit from 15.6 TPY OC to 33 TPY OC.)	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P047 - Glycol dip tank no.2 with (2) steam clean systems (B329) (modification to PTI 03-10256, issued 3/1/01). Modification to increase synthetic minor group limit from 15.6 TPY OC to 33 TPY OC.)	OAC rule 3745-31-05(A)(3)	0.80 lbs OC/hr; 3.50 tons OC/yr
	OAC rule 3745-31-05(D)	33 tons OC per rolling, 12-month period from all emission units identified in A.I.2.a (see A.I.2.a)
	OAC rule 3745-21-07(G)	None (see A.II.1.)

2. Additional Terms and Conditions

- 2.a The permittee has requested a federally enforceable limitation of 33 tons OC per rolling, 12-month period from Anti-Vibration Glycol Dipping Process Operations, emission units: P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined for purposes of avoiding PSD applicability.

Rolling limits for Anti-Vibration Glycol Dipping Process Operations were established in Permit to Install (PTI) 03-10256 which was issued on March 1, 2001 and, as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable

Emissions Unit ID: P047

restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability OC limitations effectively restrict VOC emissions.

2.b BAT requirements also include compliance with the terms and conditions of this permit.

II. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.
2. The maximum annual production of liquid filled engine mounts for Anti-Vibration Glycol Dipping Process operations, emission units: P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 shall not exceed 9,166,666 units per year, based upon a rolling, 12-month summation of the production rates for these emissions units.

Rolling limits for Anti-Vibration Glycol Dipping Process Operations were established in Permit to Install (PTI) 03-10256 which was issued on March 1, 2001 and, as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation following the issuance of this permit.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following each month for emissions unit P047:
 - a. the production rate; and
 - b. the calculated OC emissions, in lbs or tons using the following equation:

$$\text{OC emissions} = (\text{units produced/month}) \times (0.0072 \text{ pound OC/unit produced})$$
2. The permittee shall collect and record the following each month for Anti-Vibration Glycol Dipping Process Operations, emission units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined:
 - a. the total production rate; and
 - b. the total OC emissions, in tons; and
 - c. the rolling 12-month summation of monthly OC emission rates, in tons.
3. The permittee shall maintain records of the following information for this emissions unit:
 - a. the company identification for each liquid organic material employed in this emissions unit; and

301

DTR I

PTI A₁

Issued: 8/28/2003

Emissions Unit ID: P047

- b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month production rate limitation and the 12-month OC emission limitation for Anti-Vibrations Glycol Dipping Process Operations from emission units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined. The deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

Emissions Unit ID: P047

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of photochemically reactive materials. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

V. Testing Requirements

1. Compliance with the emission limitation(s) in section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- a. **Emission Limitation**

0.80 lb OC/hour

Applicable Compliance Method

The hourly emission limitation for this emission unit is based on the emission unit's potential to emit.* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was based on multiplying the maximum production rate of 110 units produced/hour by an emission factor of 0.0072 lb OC/unit produced. The emission factor was derived from stack testing a similar emissions unit on March 12, 1997.

- b. **Emission Limitation**

3.50 tons OC/year

Applicable Compliance Method

The non-combined annual emission limitation for this emission unit was based on the emission unit's potential to emit.* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was based on multiplying the maximum lbs OC/hour emitted by 8760 hours/year and dividing by 2000 lbs/ton.

- c. **Emission Limitation**

33 tons OC per rolling 12-month period from all Anti-Vibration Glycol Dipping Process Operations which include emission units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined.

Applicable Compliance Method

Compliance shall be based upon the recordkeeping specified in section A.III.2 above.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P047 - Glycol dip tank no.2 with (2) steam clean systems (B329)(modification to PTI 03-10256, issued 3/1/01). Modification to increase synthetic minor group limit from 15.6 TPY OC to 33 TPY OC.)	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P049 - Glycol dip tank no.3 with (1) steam clean system (B462) (modification to PTI 03-10256, issued 3/1/01). Modification to increase synthetic minor group limit from 15.6 TPY OC to 33 TPY OC.)	OAC rule 3745-31-05(A)(3)	0.80 lbs OC/hr; 3.50 tons OC/yr
	OAC rule 3745-31-05(D)	33 tons OC per rolling, 12-month period from all emission units identified in A.I.2.a (see A.I.2.a)
	OAC rule 3745-21-07(G)	None (see A.II.1.)

2. Additional Terms and Conditions

- 2.a The permittee has requested a federally enforceable limitation of 33 tons OC per rolling, 12-month period from Anti-Vibration Glycol Dipping Process Operations, emission units: P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined for purposes of avoiding PSD applicability.

Rolling limits for Anti-Vibration Glycol Dipping Process Operations were established in Permit to Install (PTI) 03-10256 which was issued on March 1, 2001 and, as such, rolling

Emissions Unit ID: P049

OC emission records exist. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability OC limitations effectively restrict VOC emissions.

2.b BAT requirements also include compliance with the terms and conditions of this permit.

II. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.
2. The maximum annual production of liquid filled engine mounts for Anti-Vibration Glycol Dipping Process operations, emission units: P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 shall not exceed 9,166,666 units per year, based upon a rolling, 12-month summation of the production rates for these emissions units.

Rolling limits for Anti-Vibration Glycol Dipping Process Operations were established in Permit to Install (PTI) 03-10256 which was issued on March 1, 2001 and, as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation following the issuance of this permit.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following each month for emissions unit P049:
 - a. the production rate; and
 - b. the calculated OC emissions, in lbs or tons using the following equation:

$$\text{OC emissions} = (\text{units produced/month}) \times (0.0072 \text{ pound OC/unit produced})$$
2. The permittee shall collect and record the following each month for Anti-Vibration Glycol Dipping Process Operations, emission units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined:
 - a. the total production rate; and
 - b. the total OC emissions, in tons; and
 - c. the rolling 12-month summation of monthly OC emission rates, in tons.
3. The permittee shall maintain records of the following information for this emissions unit:
 - a. the company identification for each liquid organic material employed in this emissions unit; and

- b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month production rate limitation and the 12-month OC emission limitation for Anti-Vibrations Glycol Dipping Process Operations from emission units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined. The deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of photochemically reactive materials. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

V. Testing Requirements

1. Compliance with the emission limitation(s) in section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- a. **Emission Limitation**
0.80 lb OC/hour

Applicable Compliance Method

The hourly emission limitation for this emission unit is based on the emission unit's potential to emit.* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was based on multiplying the maximum production rate of 110 units produced/hour by an emission factor of 0.0072 lb OC/unit produced. The emission factor was derived from stack testing a similar emissions unit on March 12, 1997.

- b. **Emission Limitation**
3.50 tons OC/year

Applicable Compliance Method

The non-combined annual emission limitation for this emission unit was based on the

Emissions Unit ID: P049

emission unit's potential to emit.* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was based on multiplying the maximum lbs OC/hour emitted by 8760 hours/year and dividing by 2000 lbs/ton.

- c. **Emission Limitation**
33 tons OC per rolling 12-month period from all Anti-Vibration Glycol Dipping Process Operations which include emission units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined.

Applicable Compliance Method

Compliance shall be based upon the recordkeeping specified in section A.III.2 above.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P049 - Glycol dip tank no.3 with (1) steam clean system (B462)(modification to PTI 03-10256, issued 3/1/01). Modification to increase synthetic minor group limit from 15.6 TPY OC to 33 TPY OC.)	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P050 - Glycol dip tank no.4 with (1) steam clean system (B464 (modification to PTI 03-10256, issued 3/1/01). Modification to increase synthetic minor group limit from 15.6 TPY OC to 33 TPY OC.)	OAC rule 3745-31-05(A)(3)	0.80 lbs OC/hr; 3.50 tons OC/yr
	OAC rule 3745-31-05(D)	33 tons OC per rolling, 12-month period from all emission units identified in A.I.2.a (see A.I.2.a)
	OAC rule 3745-21-07(G)	None (see A.II.1.)

2. Additional Terms and Conditions

- 2.a The permittee has requested a federally enforceable limitation of 33 tons OC per rolling, 12-month period from Anti-Vibration Glycol Dipping Process Operations, emission units: P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined for purposes of avoiding PSD applicability.

Rolling limits for Anti-Vibration Glycol Dipping Process Operations were established in Permit to Install (PTI) 03-10256 which was issued on March 1, 2001 and, as such, rolling

OC emission records exist. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability OC limitations effectively restrict VOC emissions.

2.b BAT requirements also include compliance with the terms and conditions of this permit.

II. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.
2. The maximum annual production of liquid filled engine mounts for Anti-Vibration Glycol Dipping Process operations, emission units: P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 shall not exceed 9,166,666 units per year, based upon a rolling, 12-month summation of the production rates for these emissions units.

Rolling limits for Anti-Vibration Glycol Dipping Process Operations were established in Permit to Install (PTI) 03-10256 which was issued on March 1, 2001 and, as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation following the issuance of this permit.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following each month for emissions unit P050:
 - a. the production rate; and
 - b. the calculated OC emissions, in lbs or tons using the following equation:
$$\text{OC emissions} = (\text{units produced/month}) \times (0.0072 \text{ pound OC/unit produced})$$
2. The permitte shall collect and record the following each month for Anti-Vibration Glycol Dipping Process Operations, emission units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined:
 - a. the total production rate; and
 - b. the total OC emissions, in tons; and
 - c. the rolling 12-month summation of monthly OC emission rates, in tons.

3. The permittee shall maintain records of the following information for this emissions unit:
 - a. the company identification for each liquid organic material employed in this emissions unit; and
 - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month production rate limitation and the 12-month OC emission limitation for Anti-Vibrations Glycol Dipping Process Operations from emission units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined. The deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of photochemically reactive materials. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

V. Testing Requirements

1. Compliance with the emission limitation(s) in section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- a. **Emission Limitation**

0.80 lb OC/hour

Applicable Compliance Method

The hourly emission limitation for this emission unit is based on the emission unit's potential to emit.* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was based on multiplying the maximum production rate of 110 units produced/hour by an emission factor of 0.0072 lb OC/unit produced. The emission factor was derived from stack testing a similar emissions unit on March 12, 1997.

- b. **Emission Limitation**

3.50 tons OC/year

Applicable Compliance Method

The non-combined annual emission limitation for this emission unit was based on the emission unit's potential to emit.* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was based on multiplying the maximum lbs OC/hour emitted by 8760 hours/year and dividing by 2000 lbs/ton.

- c. **Emission Limitation**

33 tons OC per rolling 12-month period from all Anti-Vibration Glycol Dipping Process Operations which include emission units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined.

Applicable Compliance Method

313

DTR Industries Inc

PTI Application: 02 12020

Issued

Facility ID: 0302000166

Emissions Unit ID: P050

Compliance shall be based upon the recordkeeping specified in section A.III.2 above.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P050 - Glycol dip tank no.4 with (1) steam clean system (B464)(modification to PTI 03-10256, issued 3/1/01). Modification to increase synthetic minor group limit from 15.6 TPY OC to 33 TPY OC.)	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P051 - Glycol dip tank no.5 with (1) steam clean system (B486)(modification to PTI 03-10256, issued 3/1/01). Modification to increase synthetic minor group limit from 15.6 TPY OC to 33 TPY OC.)	OAC rule 3745-31-05(A)(3)	0.80 lbs OC/hr; 3.50 tons OC/yr
	OAC rule 3745-31-05(D)	33 tons OC per rolling, 12-month period from all emission units identified in A.I.2.a (see A.I.2.a)
	OAC rule 3745-21-07(G)	None (see A.II.1.)

2. Additional Terms and Conditions

- 2.a The permittee has requested a federally enforceable limitation of 33 tons OC per rolling, 12-month period from Anti-Vibration Glycol Dipping Process Operations, emission units: P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined for purposes of avoiding PSD applicability.

Rolling limits for Anti-Vibration Glycol Dipping Process Operations were established in Permit to Install (PTI) 03-10256 which was issued on March 1, 2001 and, as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable

316

DTR I

PTI A₁

Issued: 8/28/2003

Emissions Unit ID: P051

restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability OC limitations effectively restrict VOC emissions.

2.b BAT requirements also include compliance with the terms and conditions of this permit.

II. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

Issued: 8/28/2003

2. The maximum annual production of liquid filled engine mounts for Anti-Vibration Glycol Dipping Process operations, emission units: P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 shall not exceed 9,166,666 units per year, based upon a rolling, 12-month summation of the production rates for these emissions units.

Rolling limits for Anti-Vibration Glycol Dipping Process Operations were established in Permit to Install (PTI) 03-10256 which was issued on March 1, 2001 and, as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation following the issuance of this permit.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following each month for emissions unit P051:
 - a. the production rate; and
 - b. the calculated OC emissions, in lbs or tons using the following equation:
$$\text{OC emissions} = (\text{units produced/month}) \times (0.0072 \text{ pound OC/unit produced})$$
2. The permittee shall collect and record the following each month for Anti-Vibration Glycol Dipping Process Operations, emission units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined:
 - a. the total production rate; and
 - b. the total OC emissions, in tons; and
 - c. the rolling 12-month summation of monthly OC emission rates, in tons.
3. The permittee shall maintain records of the following information for this emissions unit:
 - a. the company identification for each liquid organic material employed in this emissions unit; and
 - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

IV. Reporting Requirements

Emissions Unit ID: P051

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month production rate limitation and the 12-month OC emission limitation for Anti-Vibrations Glycol Dipping Process Operations from emission units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined. The deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of photochemically reactive materials. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

V. Testing Requirements

1. Compliance with the emission limitation(s) in section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- a. **Emission Limitation**

0.80 lb OC/hour

Applicable Compliance Method

The hourly emission limitation for this emission unit is based on the emission unit's potential to emit.* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was based on multiplying the maximum production rate of 110 units produced/hour by an emission factor of 0.0072 lb OC/unit produced. The emission factor was derived from stack testing a similar emissions unit on March 12, 1997.

- b. **Emission Limitation**

3.50 tons OC/year

Applicable Compliance Method

The non-combined annual emission limitation for this emission unit was based on the emission unit's potential to emit.* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was based on multiplying the maximum lbs OC/hour emitted by 8760 hours/year and dividing by 2000 lbs/ton.

- c. **Emission Limitation**

33 tons OC per rolling 12-month period from all Anti-Vibration Glycol Dipping Process Operations which include emission units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined.

Applicable Compliance Method

320

DTR I

PTI A₁

Issued: 8/28/2003

Emissions Unit ID: P051

Compliance shall be based upon the recordkeeping specified in section A.III.2 above.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P051 - Glycol dip tank no.5 with (1) steam clean system (B486)(modification to PTI 03-10256, issued 3/1/01). Modification to increase synthetic minor group limit from 15.6 TPY OC to 33 TPY OC.)	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P052 - Glycol dip tank no.6 with (1) steam clean system (B505) modification to PTI 03-10256, issued 3/1/01). Modification to increase synthetic minor group limit from 15.6 TPY OC to 33 TPY OC.)	OAC rule 3745-31-05(A)(3)	0.80 lbs OC/hr; 3.50 tons OC/yr
	OAC rule 3745-31-05(D)	33 tons OC per rolling, 12-month period from all emission units identified in A.I.2.a (see A.I.2.a)
	OAC rule 3745-21-07(G)	None (see A.II.1.)

2. Additional Terms and Conditions

- 2.a The permittee has requested a federally enforceable limitation of 33 tons OC per rolling, 12-month period from Anti-Vibration Glycol Dipping Process Operations, emission units: P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined for purposes of avoiding PSD applicability.

Rolling limits for Anti-Vibration Glycol Dipping Process Operations were established in Permit to Install (PTI) 03-10256 which was issued on March 1, 2001 and, as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability OC limitations effectively restrict VOC emissions.

- 2.b BAT requirements also include compliance with the terms and conditions of this permit.

II. Operational Restrictions

323

DTR I

PTI A₁

Issued: 8/28/2003

Emissions Unit ID: P052

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

Issued: 8/28/2003

2. The maximum annual production of liquid filled engine mounts for Anti-Vibration Glycol Dipping Process operations, emission units: P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 shall not exceed 9,166,666 units per year, based upon a rolling, 12-month summation of the production rates for these emissions units.

Rolling limits for Anti-Vibration Glycol Dipping Process Operations were established in Permit to Install (PTI) 03-10256 which was issued on March 1, 2001 and, as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation following the issuance of this permit.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following each month for emissions unit P052:
 - a. the production rate; and
 - b. the calculated OC emissions, in lbs or tons using the following equation:
$$\text{OC emissions} = (\text{units produced/month}) \times (0.0072 \text{ pound OC/unit produced})$$
2. The permittee shall collect and record the following each month for Anti-Vibration Glycol Dipping Process Operations, emission units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined:
 - a. the total production rate; and
 - b. the total OC emissions, in tons; and
 - c. the rolling 12-month summation of monthly OC emission rates, in tons.
3. The permittee shall maintain records of the following information for this emissions unit:
 - a. the company identification for each liquid organic material employed in this emissions unit; and
 - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

IV. Reporting Requirements

Emissions Unit ID: P052

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month production rate limitation and the 12-month OC emission limitation for Anti-Vibrations Glycol Dipping Process Operations from emission units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined. The deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of photochemically reactive materials. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

V. Testing Requirements

1. Compliance with the emission limitation(s) in section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- a. **Emission Limitation**

0.80 lb OC/hour

Applicable Compliance Method

The hourly emission limitation for this emission unit is based on the emission unit's potential to emit.* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was based on multiplying the maximum production rate of 110 units produced/hour by an emission factor of 0.0072 lb OC/unit produced. The emission factor was derived from stack testing a similar emissions unit on March 12, 1997.

- b. **Emission Limitation**

3.50 tons OC/year

Applicable Compliance Method

The non-combined annual emission limitation for this emission unit was based on the emission unit's potential to emit.* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was based on multiplying the maximum lbs OC/hour emitted by 8760 hours/year and dividing by 2000 lbs/ton.

- c. **Emission Limitation**

33 tons OC per rolling 12-month period from all Anti-Vibration Glycol Dipping Process Operations which include emission units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined.

Applicable Compliance Method

327

DTR I

PTI A₁

Issued: 8/28/2003

Emissions Unit ID: P052

Compliance shall be based upon the recordkeeping specified in section A.III.2 above.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P052 - Glycol dip tank no.6 with (1) steam clean system (B505)(modification to PTI 03-10256, issued 3/1/01). Modification to increase synthetic minor group limit from 15.6 TPY OC to 33 TPY OC.)	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P053 - Glycol dip tank no.7 with (1) steam clean system (B507) modification to PTI 03-10256, issued 3/1/01). Modification to increase synthetic minor group limit from 15.6 TPY OC to 33 TPY OC.)	OAC rule 3745-31-05(A)(3)	0.80 lbs OC/hr; 3.50 tons OC/yr
	OAC rule 3745-31-05(D)	33 tons OC per rolling, 12-month period from all emission units identified in A.I.2.a (see A.I.2.a)
	OAC rule 3745-21-07(G)	None (see A.II.1.)

2. Additional Terms and Conditions

- 2.a The permittee has requested a federally enforceable limitation of 33 tons OC per rolling, 12-month period from Anti-Vibration Glycol Dipping Process Operations, emission units: P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined for purposes of avoiding PSD applicability.

Rolling limits for Anti-Vibration Glycol Dipping Process Operations were established in Permit to Install (PTI) 03-10256 which was issued on March 1, 2001 and, as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable

Emissions Unit ID: P053

restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability OC limitations effectively restrict VOC emissions.

2.b BAT requirements also include compliance with the terms and conditions of this permit.

II. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

Issued: 8/28/2003

2. The maximum annual production of liquid filled engine mounts for Anti-Vibration Glycol Dipping Process operations, emission units: P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 shall not exceed 9,166,666 units per year, based upon a rolling, 12-month summation of the production rates for these emissions units.

Rolling limits for Anti-Vibration Glycol Dipping Process Operations were established in Permit to Install (PTI) 03-10256 which was issued on March 1, 2001 and, as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation following the issuance of this permit.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following each month for emissions unit P053:
 - a. the production rate; and
 - b. the calculated OC emissions, in lbs or tons using the following equation:
$$\text{OC emissions} = (\text{units produced/month}) \times (0.0072 \text{ pound OC/unit produced})$$
2. The permittee shall collect and record the following each month for Anti-Vibration Glycol Dipping Process Operations, emission units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined:
 - a. the total production rate; and
 - b. the total OC emissions, in tons; and
 - c. the rolling 12-month summation of monthly OC emission rates, in tons.
3. The permittee shall maintain records of the following information for this emissions unit:
 - a. the company identification for each liquid organic material employed in this emissions unit; and
 - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

IV. Reporting Requirements

332

DTR I

PTI A₁

Issued: 8/28/2003

Emissions Unit ID: P053

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month production rate limitation and the 12-month OC emission limitation for Anti-Vibrations Glycol Dipping Process Operations from emission units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined. The deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of photochemically reactive materials. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

V. Testing Requirements

1. Compliance with the emission limitation(s) in section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- a. **Emission Limitation**

0.80 lb OC/hour

Applicable Compliance Method

The hourly emission limitation for this emission unit is based on the emission unit's potential to emit.* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was based on multiplying the maximum production rate of 110 units produced/hour by an emission factor of 0.0072 lb OC/unit produced. The emission factor was derived from stack testing a similar emissions unit on March 12, 1997.

- b. **Emission Limitation**

3.50 tons OC/year

Applicable Compliance Method

The non-combined annual emission limitation for this emission unit was based on the emission unit's potential to emit.* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was based on multiplying the maximum lbs OC/hour emitted by 8760 hours/year and dividing by 2000 lbs/ton.

- c. **Emission Limitation**

33 tons OC per rolling 12-month period from all Anti-Vibration Glycol Dipping Process Operations which include emission units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined.

Applicable Compliance Method

334

DTR Industries Inc
PTI Application: 02 12020
Issued

Facility ID: 0302000166

Emissions Unit ID: P053

Compliance shall be based upon the recordkeeping specified in section A.III.2 above.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P053 - Glycol dip tank no.7 with (1) steam clean system (B507)(modification to PTI 03-10256, issued 3/1/01). Modification to increase synthetic minor group limit from 15.6 TPY OC to 33 TPY OC.)	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P059 - Glycol dip tank No. 8 with cleaning operation (B552) (modification to PTI 03-10256, issued 3/1/01). Modification to increase synthetic minor group limit from 15.6 TPY OC to 33 TPY OC.)	OAC rule 3745-31-05(A)(3)	0.42 lbs OC/hr; 1.84 tons OC/yr
	OAC rule 3745-31-05(D)	33 tons OC per rolling, 12-month period from all emission units identified in A.I.2.a (see A.I.2.a)
	OAC rule 3745-21-07(G)	None (see A.II.1.)

2. Additional Terms and Conditions

- 2.a The permittee has requested a federally enforceable limitation of 33 tons OC per rolling, 12-month period from Anti-Vibration Glycol Dipping Process Operations, emission units: P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined for purposes of avoiding PSD applicability.

Rolling limits for Anti-Vibration Glycol Dipping Process Operations were established in Permit to Install (PTI) 03-10256 which was issued on March 1, 2001 and, as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable

Emissions Unit ID: P059

restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability OC limitations effectively restrict VOC emissions.

2.b BAT requirements also include compliance with the terms and conditions of this permit.

II. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

Issued: 8/28/2003

2. The maximum annual production of liquid filled engine mounts for Anti-Vibration Glycol Dipping Process operations, emission units: P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 shall not exceed 9,166,666 units per year, based upon a rolling, 12-month summation of the production rates for these emissions units.

Rolling limits for Anti-Vibration Glycol Dipping Process Operations were established in Permit to Install (PTI) 03-10256 which was issued on March 1, 2001 and, as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation following the issuance of this permit.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following each month for emissions unit P059:
 - a. the production rate; and
 - b. the calculated OC emissions, in lbs or tons using the following equation:
$$\text{OC emissions} = (\text{units produced/month}) \times (0.0072 \text{ pound OC/unit produced})$$
2. The permitte shall collect and record the following each month for Anti-Vibration Glycol Dipping Process Operations, emission units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined:
 - a. the total production rate; and
 - b. the total OC emissions, in tons; and
 - c. the rolling 12-month summation of monthly OC emission rates, in tons.
3. The permittee shall maintain records of the following information for this emissions unit:
 - a. the company identification for each liquid organic material employed in this emissions unit; and
 - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

IV. Reporting Requirements

339

DTR I

PTI A₁

Issued: 8/28/2003

Emissions Unit ID: P059

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month production rate limitation and the 12-month OC emission limitation for Anti-Vibrations Glycol Dipping Process Operations from emission units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined. The deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of photochemically reactive materials. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

V. Testing Requirements

1. Compliance with the emission limitation(s) in section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- a. **Emission Limitation**

0.42 lb OC/hour

Applicable Compliance Method

The hourly emission limitation for this emission unit is based on the emission unit's potential to emit.* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was based on multiplying the maximum production rate of 58 units produced/hour by an emission factor of 0.0072 lb OC/unit produced. The emission factor was derived from stack testing a similar emissions unit on March 12, 1997.

- b. **Emission Limitation**

1.84 tons OC/year

Applicable Compliance Method

The non-combined annual emission limitation for this emission unit was based on the emission unit's potential to emit.* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was based on multiplying the maximum lbs OC/hour emitted by 8760 hours/year and dividing by 2000 lbs/ton.

- c. **Emission Limitation**

33 tons OC per rolling 12-month period from all Anti-Vibration Glycol Dipping Process Operations which include emission units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined.

Applicable Compliance Method

341

DTR Industries Inc

PTI Application: 02 12020

Issued

Facility ID: 0302000166

Emissions Unit ID: P059

Compliance shall be based upon the recordkeeping specified in section A.III.2 above.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P059 - Glycol dip tank with steam cleaning operation B552 (submerged assembling machine 8)(modification to PTI 03-10256, issued 3/1/01). Modification to increase synthetic minor group limit from 15.6 TPY OC to 33 TPY OC.)	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

343

DTR I

PTI A₁

Issued: 8/28/2003

Emissions Unit ID: P059

V. Testing Requirements

None

344

DTR I

PTI A₁

Issued: 8/28/2003

Emissions Unit ID: P059

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P060 - Glycol dip tank No. 9 with steam cleaning operation (B596) (modification to PTI 03-10256, issued 3/1/01). Modification to increase synthetic minor group limit from 15.6 TPY OC to 33 TPY OC.)	OAC rule 3745-31-05(A)(3)	0.42 lbs OC/hr; 1.84 tons OC/yr
	OAC rule 3745-31-05(D)	33 tons OC per rolling, 12-month period from all emission units identified in A.I.2.a (see A.I.2.a)
	OAC rule 3745-21-07(G)	None (see A.II.1.)

2. Additional Terms and Conditions

- 2.a The permittee has requested a federally enforceable limitation of 33 tons OC per rolling, 12-month period from Anti-Vibration Glycol Dipping Process Operations, emission units: P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined for purposes of avoiding PSD applicability.

Rolling limits for Anti-Vibration Glycol Dipping Process Operations were established in Permit to Install (PTI) 03-10256 which was issued on March 1, 2001 and, as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability OC limitations effectively restrict VOC emissions.

- 2.b BAT requirements also include compliance with the terms and conditions of this permit.

II. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.
2. The maximum annual production of liquid filled engine mounts for Anti-Vibration Glycol Dipping Process operations, emission units: P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 shall not exceed 9,166,666 units per year, based upon a rolling, 12-month summation of the production rates for these emissions units.

Rolling limits for Anti-Vibration Glycol Dipping Process Operations were established in Permit to Install (PTI) 03-10256 which was issued on March 1, 2001 and, as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation following the issuance of this permit.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following each month for emissions unit P060:
 - a. the production rate; and
 - b. the calculated OC emissions, in lbs or tons using the following equation:
$$\text{OC emissions} = (\text{units produced/month}) \times (0.0072 \text{ pound OC/unit produced})$$
2. The permittee shall collect and record the following each month for Anti-Vibration Glycol Dipping Process Operations, emission units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined:
 - a. the total production rate; and
 - b. the total OC emissions, in tons; and
 - c. the rolling 12-month summation of monthly OC emission rates, in tons.
3. The permittee shall maintain records of the following information for this emissions unit:
 - a. the company identification for each liquid organic material employed in this emissions unit; and

- b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month production rate limitation and the 12-month OC emission limitation for Anti-Vibrations Glycol Dipping Process Operations from emission units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined. The deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of photochemically reactive materials. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

V. Testing Requirements

1. Compliance with the emission limitation(s) in section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- a. **Emission Limitation**

0.42 lb OC/hour

Applicable Compliance Method

The hourly emission limitation for this emission unit is based on the emission unit's potential to emit.* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was based on multiplying the maximum production rate of 58 units produced/hour by an emission factor of 0.0072 lb OC/unit produced. The emission factor was derived from stack testing a similar emissions unit on March 12, 1997.

- b. **Emission Limitation**

1.84 tons OC/year

Applicable Compliance Method

The non-combined annual emission limitation for this emission unit was based on the emission unit's potential to emit.* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was based on multiplying the maximum lbs OC/hour emitted by 8760 hours/year and dividing by 2000 lbs/ton.

- c. **Emission Limitation**

33 tons OC per rolling 12-month period from all Anti-Vibration Glycol Dipping Process Operations which include emission units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined.

Applicable Compliance Method

349

DTR I

PTI A₁

Issued: 8/28/2003

Emissions Unit ID: P060

Compliance shall be based upon the recordkeeping specified in section A.III.2 above.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P060 - Glycol dip tank with steam cleaning operation B596 (submerged assembling machine 9)(modification to PTI 03-10256, issued 3/1/01). Modification to increase synthetic minor group limit from 15.6 TPY OC to 33 TPY OC.)	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

351

DTR I

PTI A₁

Issued: 8/28/2003

Emissions Unit ID: P060

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P066 - Glycol dip tank with steam cleaning operation	OAC rule 3745-31-05(A)(3)	0.76 lbs OC/hr; 3.33 tons OC/yr
B676 (submerged assembling machine (modification to PTI 03-10256, issued 3/1/01). Modification to increase synthetic minor group limit from 15.6 TPY OC to 33 TPY OC.)	OAC rule 3745-31-05(D)	33 tons OC per rolling, 12-month period from all emission units identified in A.I.2.a (see A.I.2.a)
	OAC rule 3745-21-07(G)	None (see A.II.1.)

2. Additional Terms and Conditions

- 2.a The permittee has requested a federally enforceable limitation of 33 tons OC per rolling, 12-month period from Anti-Vibration Glycol Dipping Process Operations, emission units: P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined for purposes of avoiding PSD applicability.

Rolling limits for Anti-Vibration Glycol Dipping Process Operations were established in Permit to Install (PTI) 03-10256 which was issued on March 1, 2001 and, as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability OC limitations effectively restrict VOC emissions.

- 2.b BAT requirements also include compliance with the terms and conditions of this permit.

II. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.
2. The maximum annual production of liquid filled engine mounts for Anti-Vibration Glycol Dipping Process operations, emission units: P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 shall not exceed 9,166,666 units per year, based upon a rolling, 12-month summation of the production rates for these emissions units.

Rolling limits for Anti-Vibration Glycol Dipping Process Operations were established in Permit to Install (PTI) 03-10256 which was issued on March 1, 2001 and, as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation following the issuance of this permit.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following each month for emissions unit P066:
 - a. the production rate; and
 - b. the calculated OC emissions, in lbs or tons using the following equation:
$$\text{OC emissions} = (\text{units produced/month}) \times (0.0072 \text{ pound OC/unit produced})$$
2. The permittee shall collect and record the following each month for Anti-Vibration Glycol Dipping Process Operations, emission units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined:
 - a. the total production rate; and
 - b. the total OC emissions, in tons; and
 - c. the rolling 12-month summation of monthly OC emission rates, in tons.
3. The permittee shall maintain records of the following information for this emissions unit:
 - a. the company identification for each liquid organic material employed in this emissions unit; and

- b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month production rate limitation and the 12-month OC emission limitation for Anti-Vibrations Glycol Dipping Process Operations from emission units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined. The deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of photochemically reactive materials. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

V. Testing Requirements

1. Compliance with the emission limitation(s) in section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- a. **Emission Limitation**

0.76 lb OC/hour

Applicable Compliance Method

The hourly emission limitation for this emission unit is based on the emission unit's potential to emit.* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was based on multiplying the maximum production rate of 105 units produced/hour by an emission factor of 0.0072 lb OC/unit produced. The emission factor was derived from stack testing a similar emissions unit on March 12, 1997.

- b. **Emission Limitation**

3.33 tons OC/year

Applicable Compliance Method

The non-combined annual emission limitation for this emission unit was based on the emission unit's potential to emit.* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was based on multiplying the maximum lbs OC/hour emitted by 8760 hours/year and dividing by 2000 lbs/ton.

- c. **Emission Limitation**

33 tons OC per rolling 12-month period from all Anti-Vibration Glycol Dipping Process Operations which include emission units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined.

Applicable Compliance Method

356

DTR I

PTI A₁

Issued: 8/28/2003

Emissions Unit ID: P066

Compliance shall be based upon the recordkeeping specified in section A.III.2 above.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P066 - Glycol dip tank with steam cleaning operation B676 (submerged assembling machine)	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

358

DTR Industries Inc

PTI Application: **02 12020**

Issued

Facility ID: **0302000166**

Emissions Unit ID: P066

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P070 - Glycol dip tank with steam cleaning operation B815 (submerged assembling machine)	OAC rule 3745-31-05(A)(3)	0.65 lbs OC/hr; 2.85 tons OC/yr
	OAC rule 3745-31-05(D)	33 tons OC per rolling, 12-month period from all emission units identified in A.I.2.a (see A.I.2.a)
	OAC rule 3745-21-07(G)	None (see A.II.1.)

2. Additional Terms and Conditions

- 2.a The permittee has requested a federally enforceable limitation of 33 tons OC per rolling, 12-month period from Anti-Vibration Glycol Dipping Process Operations, emission units: P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined for purposes of avoiding PSD applicability.

All of the above Anti-Vibration Glycol Dipping Process Operations have existing records of emissions of OC, therefore it is not necessary to establish federally enforceable restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability OC limitations effectively restrict VOC emissions.

- 2.b BAT requirements also include compliance with the terms and conditions of this permit.

II. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this

emissions unit is prohibited.

2. The maximum annual production of liquid filled engine mounts for Anti-Vibration Glycol Dipping Process operations, emission units: P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 shall not exceed 9,166,666 units per year, based upon a rolling, 12-month summation of the production rates for these emissions units.

All of the above Anti-Vibration Glycol Dipping Process Operations have existing records of emissions of OC, therefore it is not necessary to establish federally enforceable restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability OC limitations effectively restrict VOC emissions.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following each month for emissions unit P070:
 - a. the production rate; and
 - b. the calculated OC emissions, in lbs or tons using the following equation:
$$\text{OC emissions} = (\text{units produced/month}) \times (0.0072 \text{ pound OC/unit produced})$$
2. The permittee shall collect and record the following each month for Anti-Vibration Glycol Dipping Process Operations, emission units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined:
 - a. the total production rate; and
 - b. the total OC emissions, in tons; and
 - c. the rolling 12-month summation of monthly OC emission rates, in tons.
3. The permittee shall maintain records of the following information for this emissions unit:
 - a. the company identification for each liquid organic material employed in this emissions unit; and
 - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

361

DTR I

PTI A₁

Issued: 8/28/2003

Emissions Unit ID: P070

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month production rate limitation and the 12-month OC emission limitation for Anti-Vibrations Glycol Dipping Process Operations from emission units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined. The deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of photochemically reactive materials. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

V. Testing Requirements

1. Compliance with the emission limitation(s) in section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

a. **Emission Limitation**

0.65 lb OC/hour

Applicable Compliance Method

The hourly emission limitation for this emission unit is based on the emission unit's potential to emit.* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was based on multiplying the maximum production rate of 90 units produced/hour by an emission factor of 0.0072 lb OC/unit produced. The emission factor was derived from stack testing a similar emissions unit on March 12, 1997.

b. **Emission Limitation**

2.85 tons OC/year

Applicable Compliance Method

The non-combined annual emission limitation for this emission unit was based on the emission unit's potential to emit.* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was based on multiplying the maximum lbs OC/hour emitted by 8760 hours/year and dividing by 2000 lbs/ton.

c. **Emission Limitation**

33 tons OC per rolling 12-month period from all Anti-Vibration Glycol Dipping Process Operations which include emission units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined.

Applicable Compliance Method

Compliance shall be based upon the recordkeeping specified in section A.III.2 above.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P070 - Glycol dip tank with steam cleaning operation B815 (submerged assembling machine)	See below	See below

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions units P070, P071 and P072 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application, the SCREEN 3.0 and Industrial Source Complex - Short Term III models. The predicted 1-hour maximum ground-level concentration from the use of the models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Ethylene Glycol
TLV (mg/m³): 73.7

Emissions Unit ID: P070

Maximum Hourly Emission Rate (lbs/hr): 2.87 *
 Predicted 1-Hour Maximum Ground-Level
 Concentration (ug/m3): 414.3
 MAGLC (ug/m3): 1755

* Combined emission rates for P070, P071, and P072

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

365

DTR I

PTI A₁

Issued: 8/28/2003

Emissions Unit ID: P070

IV. Reporting Requirements

None

366

DTR I

PTI A₁

Issued: 8/28/2003

Emissions Unit ID: P070

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P071 - Glycol dip tank with steam cleaning operation B860 (submerged assembling machine)	OAC rule 3745-31-05(A)(3)	1.73 lbs OC/hr; 7.58 tons OC/yr
	OAC rule 3745-31-05(D)	33 tons OC per rolling, 12-month period from all emission units identified in A.I.2.a (see A.I.2.a)
	OAC rule 3745-21-07(G)	None (see A.II.1.)

2. Additional Terms and Conditions

- 2.a The permittee has requested a federally enforceable limitation of 33 tons OC per rolling, 12-month period from Anti-Vibration Glycol Dipping Process Operations, emission units: P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined for purposes of avoiding PSD applicability.

All of the above Anti-Vibration Glycol Dipping Process Operations have existing records of emissions of OC, therefore it is not necessary to establish federally enforceable restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability OC limitations effectively restrict VOC emissions.

- 2.b BAT requirements also include compliance with the terms and conditions of this permit.

II. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this

Emissions Unit ID: P071

emissions unit is prohibited.

2. The maximum annual production of liquid filled engine mounts for Anti-Vibration Glycol Dipping Process operations, emission units: P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 shall not exceed 9,166,666 units per year, based upon a rolling, 12-month summation of the production rates for these emissions units.

All of the above Anti-Vibration Glycol Dipping Process Operations have existing records of emissions of OC, therefore it is not necessary to establish federally enforceable restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability OC limitations effectively restrict VOC emissions.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following each month for emissions unit P071:
 - a. the production rate; and
 - b. the calculated OC emissions, in lbs or tons using the following equation:
$$\text{OC emissions} = (\text{units produced/month}) \times (0.0072 \text{ pound OC/unit produced})$$
2. The permittee shall collect and record the following each month for Anti-Vibration Glycol Dipping Process Operations, emission units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined:
 - a. the total production rate; and
 - b. the total OC emissions, in tons; and
 - c. the rolling 12-month summation of monthly OC emission rates, in tons.
3. The permittee shall maintain records of the following information for this emissions unit:
 - a. the company identification for each liquid organic material employed in this emissions unit; and
 - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month production rate limitation and the 12-month OC emission limitation for Anti-Vibrations Glycol Dipping Process Operations from emission units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined. The deviation reports

369

DTR I

PTI A₁

Issued: 8/28/2003

Emissions Unit ID: P071

shall be submitted in accordance with the General Terms and Conditions of this permit.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of photochemically reactive materials. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

V. Testing Requirements

1. Compliance with the emission limitation(s) in section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

a. **Emission Limitation**

1.73 lb OC/hour

Applicable Compliance Method

The hourly emission limitation for this emission unit is based on the emission unit's potential to emit.* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was based on multiplying the maximum production rate of 240 units produced/hour by an emission factor of 0.0072 lb OC/unit produced. The emission factor was derived from stack testing a similar emissions unit on March 12, 1997.

b. **Emission Limitation**

7.58 tons OC/year

Applicable Compliance Method

The non-combined annual emission limitation for this emission unit was based on the emission unit's potential to emit.* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was based on multiplying the maximum lbs OC/hour emitted by 8760 hours/year and dividing by 2000 lbs/ton.

c. **Emission Limitation**

33 tons OC per rolling 12-month period from all Anti-Vibration Glycol Dipping Process Operations which include emission units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined.

Applicable Compliance Method

Compliance shall be based upon the recordkeeping specified in section A.III.2 above.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P071 - Glycol dip tank with steam cleaning operation B860 (submerged assembling machine)	See below	See below

2. Additional Terms and Conditions

- None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

- The permit to install for this emissions units P070, P071 and P072 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application, the SCREEN 3.0 and Industrial Source Complex - Short Term III models. The predicted 1-hour maximum ground-level concentration from the use of the models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Ethylene Glycol

TLV (mg/m³): 73.7

Maximum Hourly Emission Rate (lbs/hr): 2.87 *

Predicted 1-Hour Maximum Ground-Level
 Concentration (ug/m³): 414.3

MAGLC (ug/m³): 1755

* Combined emission rates for P070, P071, and P072

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

373

DTR Industries Inc

PTI Application: 02 12020

Issued

Facility ID: 0302000166

Emissions Unit ID: P071

IV. Reporting Requirements

None

374

DTR I

PTI A₁

Issued: 8/28/2003

Emissions Unit ID: P071

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P072 - Glycol dip tank with steam cleaning operation B869 (submerged assembling machine)	OAC rule 3745-31-05(A)(3) OAC rule 3745-31-05(D) OAC rule 3745-21-07(G)	1.73 lbs OC/hr; 7.58 tons OC/yr 33 tons OC per rolling, 12-month period from all emission units identified in A.I.2.a (see A.I.2.a) None (see A.II.1.)

2. Additional Terms and Conditions

- 2.a The permittee has requested a federally enforceable limitation of 33 tons OC per rolling, 12-month period from Anti-Vibration Glycol Dipping Process Operations, emission units: P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined for purposes of avoiding PSD applicability.

All of the above Anti-Vibration Glycol Dipping Process Operations have existing records of emissions of OC, therefore it is not necessary to establish federally enforceable restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability OC limitations effectively restrict VOC emissions.

- 2.b BAT requirements also include compliance with the terms and conditions of this permit.

II. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this

emissions unit is prohibited.

2. The maximum annual production of liquid filled engine mounts for Anti-Vibration Glycol Dipping Process operations, emission units: P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 shall not exceed 9,166,666 units per year, based upon a rolling, 12-month summation of the production rates for these emissions units.

All of the above Anti-Vibration Glycol Dipping Process Operations have existing records of emissions of OC, therefore it is not necessary to establish federally enforceable restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability OC limitations effectively restrict VOC emissions.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following each month for emissions unit P072:
 - a. the production rate; and
 - b. the calculated OC emissions, in lbs or tons using the following equation:
$$\text{OC emissions} = (\text{units produced/month}) \times (0.0072 \text{ pound OC/unit produced})$$
2. The permittee shall collect and record the following each month for Anti-Vibration Glycol Dipping Process Operations, emission units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined:
 - a. the total production rate; and
 - b. the total OC emissions, in tons; and
 - c. the rolling 12-month summation of monthly OC emission rates, in tons.
3. The permittee shall maintain records of the following information for this emissions unit:
 - a. the company identification for each liquid organic material employed in this emissions unit; and
 - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month production rate limitation and the 12-month OC emission limitation for Anti-Vibrations Glycol Dipping Process Operations from emission units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined. The deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of photochemically reactive materials. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

V. Testing Requirements

1. Compliance with the emission limitation(s) in section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

a. **Emission Limitation**

1.73 lb OC/hour

Applicable Compliance Method

The hourly emission limitation for this emission unit is based on the emission unit's potential to emit.* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was based on multiplying the maximum production rate of 240 units produced/hour by an emission factor of 0.0072 lb OC/unit produced. The emission factor was derived from stack testing a similar emissions unit on March 12, 1997.

b. **Emission Limitation**

7.58 tons OC/year

Applicable Compliance Method

The non-combined annual emission limitation for this emission unit was based on the emission unit's potential to emit.* Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was based on multiplying the maximum lbs OC/hour emitted by 8760 hours/year and dividing by 2000 lbs/ton.

c. **Emission Limitation**

33 tons OC per rolling 12-month period from all Anti-Vibration Glycol Dipping Process Operations which include emission units P046, P047, P049, P050, P051, P052, P053, P059, P060, P066, P070, P071 and P072 combined.

Applicable Compliance Method

Compliance shall be based upon the recordkeeping specified in section A.III.2 above.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P072 - Glycol dip tank with steam cleaning operation B869 (submerged assembling machine)	See below	See below

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions units P070, P071 and P072 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application, the SCREEN 3.0 and Industrial Source Complex - Short Term III models. The predicted 1-hour maximum ground-level concentration from the use of the models was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Ethylene Glycol
TLV (mg/m³): 73.7

Emissions Unit ID: P072

Maximum Hourly Emission Rate (lbs/hr): 2.87 *
 Predicted 1-Hour Maximum Ground-Level
 Concentration (ug/m3): 414.3
 MAGLC (ug/m3): 1755

* Combined emission rates for P070, P071, and P072

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.)
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

381

DTR I

PTI A₁

Issued: 8/28/2003

Emissions Unit ID: P072

IV. Reporting Requirements

None

382

DTR I

PTI A₁

Issued: 8/28/2003

Emissions Unit ID: P072

V. Testing Requirements

None

VI. Miscellaneous Requirements

None