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

4/3/2012

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Larry Hicks
STANLEY ELECTRIC US COMPANY
420 East High Street
London, OH 43140

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0149000089
Permit Number: P0109680
Permit Type: Initial Installation
County: Madison

Dear Permit Holder:

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

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now.If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA Region 5 -*Via E-Mail Notification*
Ohio EPA-CDO

Permit Strategy Write-Up

1. Check all that apply:

   Synthetic Minor Determination

   Netting Determination

2. Source Description:

   Stanley Electric U.S. Company, Inc. (Stanley), located in London, Ohio is a facility that manufactures automotive headlights. This permitting action includes the installation of a new line to apply coatings to plastic parts in the production of automotive lighting assemblies. The new emissions unit (R044) is similar in design and construction to other units that have been permitted and installed at the facility. Particulate emissions are controlled through the use of a dry filtration system. EU R044 is considered as part of the affected source with respect to 40 CFR Part 63, subpart PPPP for Surface Coating of Plastic Parts and Products. The requirement to operate the RTO is necessary to avoid future PSD considerations for VOC and may be necessary to demonstrate compliance with the applicable requirements of subpart PPPP (the facility has chosen the "emissions rate with add-on controls" option for demonstrating compliance with the PPPP subpart and may use the control efficiency of the RTO if all of the subpart requirements are met).

3. Facility Emissions and Attainment Status:

   Stanley is located in Madison County, Ohio which is designated as attainment for all of the criteria pollutants. With respect to facility-wide potential-to-emit, Stanley is a Title V facility but remains below the 250 tpy major source threshold for PSD.

4. Source Emissions:

   Emissions unit R044 is subject to the following rules:

   OAC rule 3745-31-05(A)(3), as effective 11/30/2001 – In accordance with pre-SB265 BAT guidelines, an hourly VOC emissions limitations was established at potential-to-emit taking into consideration the VOC control requirements established under OAC rule 3745-31-05(D) and hourly and annual PE limitations were established taking into consideration the requirements for surface coating processes established under OAC rule 3745-17-11(C). PE and VOC limitations were established using the information in the following calculations:

   VOC: Coating = 2.00 gal/hr * 6.09 lbs/gal VOC = 12.18 lbs/hr

   Clean-up = not considered for hourly limitations because clean-up is not performed on an hourly basis

   Total uncontrolled VOC = 12.18 lbs/hr
   Total controlled VOC (95%) = 0.61 lbs/hr

   PE: Transfer efficiency = 65%
   Control efficiency = 95%

Coating = 2.0 gal/hr * 7.34 lbs PE/gal * (1- 0.65) * (1 – 0.95) = 0.26 lbs/hr = 1.14 TPY

OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/2006 – In accordance with the July 2, 2010 BAT guidance, the BAT limits for this source will "sunset" after USEPA approves the SIP. Upon SIP approval, there will be no BAT limits for PE or VOC emissions from this emissions unit because the potential to emit for VOC emissions is less than 10 tpy taking into consideration the VOC control requirements established under OAC rule 3745-31-05(D) and the potential to emit for PE is less than 10 tpy taking into consideration the requirements for surface coating processes established under OAC rule 3745-17-11(C).

OAC rule 3745-31-05(D) – Synthetic minor limitations have been established for the purpose of limiting VOC emissions for future PSD consideration. The synthetic minor limitations include only the rolling, 12-month limitations and the requirement to employ control equipment for EU R044. It was not necessary to develop any specific operational restrictions for synthetic minor purposes (other than the control equipment requirements). Monitoring, recordkeeping, reporting and testing terms have been included to ensure compliance with the synthetic minor limitations.

VOC: Coating = 2.00 gal/hr * 6.09 lbs/gal VOC = 12.18 lbs/hr = 53.35 TPY

Clean-up = 300gal/month * 12 months * 6.68 lb VOC/gal = 24,048 lbs/yr = 12.02 TPY

Total uncontrolled VOC = 65.37 TPY
Total controlled VOC (95%) = 3.27 TPY

OAC rule 3745-17-11(C) – Standard Terms and Conditions Library terms have been used to establish operational restrictions, monitoring/recordkeeping and reporting requirements associated with the dry particulate filtration system.

40 CFR Part 63, subpart PPPP and subpart A – Establishes a 0.45 lb HAP/gal coating solids restriction on a rolling, 12-month basis.

ORC 3704.03(F)(4)(b) – Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute" was not necessary because the emissions unit is part of the affected source with respect to 40 CFR Part 63, subpart PPPP for Surface Coating of Plastic Parts and Products and the pollutants that would otherwise be regulated by 'Option A' are regulated by the PPPP MACT.

5. Conclusion:

   The terms and conditions contained within PTI P0109680 are sufficient to ensure compliance with the applicable state and federal regulations.

6. Please provide additional notes or comments as necessary:

   None

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

Pollutant	Tons Per Year
VOC	3.27
PE	1.14

PUBLIC NOTICE
4/3/2012 Issuance of Draft Air Pollution Permit-To-Install

STANLEY ELECTRIC US COMPANY
420 East High Street,
London, OH 43140
Madison County
FACILITY DESC.: Vehicular Lighting Equipment Manufacturing
PERMIT #: P0109680
PERMIT TYPE: Initial Installation
PERMIT DESC: Installation and operation of a new line to apply coatings to plastic parts in the production of automotive lighting assemblies.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: http://epa.ohio.gov/dapc/permitsonline.aspx by entering the permit # or: Benjamin Halton, Ohio EPA DAPC, Central District Office, 50 West Town Street, 6th Floor P.O. Box 1049, Columbus, OH 43216-1049. Ph: (614)728-3778

Ohio | Environmental Protection Agency

DRAFT

Division of Air Pollution Control
Permit-to-Install
for
STANLEY ELECTRIC US COMPANY

Facility ID:	0149000089
Permit Number:	P0109680
Permit Type:	Initial Installation
Issued:	4/3/2012
Effective:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install
for
STANLEY ELECTRIC US COMPANY

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Authorization

Facility ID:	0149000089
Facility Description:	Vehicular lighting equipment
Application Number(s):	A0043991
Permit Number:	P0109680
Permit Description:	Installation and operation of a new line to apply coatings to plastic parts in the production of automotive lighting assemblies.
Permit Type:	Initial Installation
Permit Fee:	$200.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date:	4/3/2012
Effective Date:	To be entered upon final issuance

This document constitutes issuance to:

STANLEY ELECTRIC US COMPANY
420 East High Street
London, OH 43140

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

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

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0109680
Permit Description: Installation and operation of a new line to apply coatings to plastic parts in the production of automotive lighting assemblies.

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

Emissions Unit ID:	**R044**
Company Equipment ID:	DP3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

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

(1) Standard Term and Condition A.2.a), Severability Clause

(2) Standard Term and Condition A.3.c) through A. 3.e)General Requirements

(3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements

(4) Standard Term and Condition A.9., Reporting Requirements

(5) Standard Term and Condition A.10., Applicability

(6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install

(7) Standard Term and Condition A.14., Public Disclosure

(8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(9) Standard Term and Condition A.16., Fees

(10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

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

b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

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

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

c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

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

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

4. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

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

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

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

(4) The analytical techniques or methods used.

(5) The results of such analyses.

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

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

c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

(1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Central District Office.

(2) Quarterly written reports of (i) any deviations from federally enforceable emissionlimitations, operationalrestrictions, andcontroldeviceoperatingparameterlimitations, 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 Ohio EPA DAPC, Central District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, andreportingrequirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Central District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

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

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

6. Compliance Requirements

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

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

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

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

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

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

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

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

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

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

7. Best Available Technology

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

8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Central District Office.

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 Ohio EPA DAPC, Central District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

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

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

a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as “permanently shut down” in Ohio EPA’s “Air Services” along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

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

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

12. Permit-To-Operate Application

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

13. Construction Compliance Certification

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

a) Completion of initial installation date shall be enteredupon completion of construction and prior to start-up.

b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

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

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

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

16. Fees

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

17. Permit Transfers

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

18. Risk Management Plans

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

19. Title IV Provisions

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

B. Facility-Wide Terms and Conditions

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

   a) None.

C. Emissions Unit Terms and Conditions

1. R044, DP3

Operations, Property and/or Equipment Description:

DP3 coating line with spray booth, ovens, and dry filtration venting to thermal incinerator 20-4.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	Volatile organic compound (VOC) emissions shall not exceed 0.61 pound per hour (lb/hr), excluding cleanup materials. Particulate emissions (PE) shall not exceed 0.26 lb/hr and 1.14 ton per year (TPY). See b)(2)a., b)(2)b., and b)(2)c.
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/2006	See b)(2)d.
c.	OAC rule 3745-31-05(D) (Synthetic minor to avoid PSD)	VOC emissions shall not exceed 3.27 tons per rolling, 12-month period, including cleanup materials. VOC emissions from this emissions unit shall be reduced by an overall control efficiency of at least 95%. See c)(1)
d.	OAC rule 3745-17-11(C)	See c)(2) and c)(3)
e.	40 CFR Part 63, Subpart MMMM	See b)(2)e.
f.	40 CFR Part 63, Subpart A (40 CFR Part 63.1-16)	See b)(2)f.

(2) Additional Terms and Conditions

a. The hourly VOC emissions limitation was established to reflect the potential to emit for this emissions unit taking into consideration the capture and control requirements established under OAC rule 3745-31-05(D) for the control of VOC emissions. The monitoring, recordkeeping, reporting, and testing requirements for the VOC capture and control system as established in the following terms and conditions are sufficient to demonstrate compliance with this limitation.

b. The hourly and annual PE limitations were established to reflect the potential to emit for this emissions unit taking into consideration the requirements established under OAC rule 3745-17-11(C) for the control of particulate emissions. The monitoring, recordkeeping, reporting, and testing requirements for the dry particulate filter system as established in the following terms and conditions are sufficient to demonstrate compliance with these limitations.

c. The permittee has satisfied the BAT requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for emissions units that have the potential to emit less than ten tons per year for pollutants to which National Ambient Air Quality Standards (NAAQS) apply. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Until the SIP revision occurs and U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. When U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05, these emissions limitations/control measures will no longer apply.

d. The following rule paragraphs will apply when U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP:

i. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions from this air contaminant source because the controlled potential to emit for PE is less than 10 TPY taking into consideration the requirements established under OAC rule 3745-17-11(C); and

ii. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source because the controlled potential to emit for VOC is less than 10 TPY taking into consideration the federally enforceable limitations on the potential to emit established under OAC rule 3745-31-05(D).

e. The facility is subject to the following applicable emissions limitation(s) identified in 40 CFR Part 63, Subpart PPPP, Section 63.4490(b)(2):

i. For each existing automotive lamp coating affected source, limit organic HAP emissions to no more than 0.45 kg (0.45lb) per kg (lb) coating solids used during each 12-month compliance period.

f. Table 2 to subpart PPPP of 40 CFR Part 63 - "Applicability of General Provisions (Subpart A) to subpart PPPP of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.

c) Operational Restrictions

(1) All of the emissions from this emissions unit shall be captured and directed to the RTO whenever the emissions unit is in operation.

(2) The permittee shall install and operate a dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filterin accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

(3) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee,the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

(4) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart PPPP.

(5) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

d) Monitoring and/or Recordkeeping Requirements

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

a. the name and identification number for each coating and cleanup material employed;

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

c. the VOC content of each coating and cleanup material, in pounds per gallon;

d. if a credit to emissions from recovered materials is to be used in emission calculations, the number of gallons of each material reclaimed for off-site recycle, recovery, and/or disposal from the emissions unit;

e. the total monthly VOC emissions, in tons. The controlled VOC emission rate shall be calculated using the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance; and

f. the rolling, 12-month VOC emissions, in tons.

(2) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Ohio EPA Central District Office upon request.

(3) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

(4) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

(5) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(6) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

(7) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average combustion temperature within the thermal oxidizer, for any 3-hour block of time when the emissions unit(s) controlled by the thermal oxidizer is/are in operation, shall not be more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance. Until compliance testing has been conducted, the thermal oxidizer shall be operated and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manual.

(8) The permittee shall properly install, operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the emissions unit(s) is/are in operation, including periods of startup and shutdown. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and the operating manuals, with any modifications deemed necessary by the permittee. The acceptable temperature setting shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate temperature range is established to demonstrate compliance.Following compliance testing, the permittee shall collect and record the following information each day the emissions unit(s) is/are in operation:

a. all 3-hour blocks of time, when the emissions unit(s) controlled by the thermal oxidizer was/were in operation, during which the average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance; and

b. a log or record of the operating time for the capture (collection) system, thermal oxidizer, monitoring equipment, and the associated emissions unit(s).

These records shall be maintained at the facility for a period of three years.

(9) Whenever the monitored average combustion temperature within the thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

a. a description of the corrective action;

b. the date corrective action was completed;

c. the date and time the deviation ended;

d. the total period of time (in minutes) during which there was a deviation;

e. the temperature readings immediately after the corrective action was implemented; and

f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature range/limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature range/limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature range/limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

(10) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart PPPP.

(11) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

e) Reporting Requirements

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

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

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

i. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation;

ii. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the emissions were not captured and directed to the RTO;

iii. each period of time (start time and date, and end time and date)when the average combustion temperature within the thermal oxidizer was outside of the range specified by the manufacturer and/or outside of the acceptable range following any required compliance demonstration;

iv. each incident of deviation described in “ii”or “iii” (above) where a prompt investigation was not conducted;

v. each incident of deviation described in “ii”or “iii” where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the temperature within the thermal oxidizer into compliance with the acceptable range, was determined to be necessary and was not taken;

vi. each incident of deviation described in “ii”or “iii” where proper records were not maintained for the investigation and/or the corrective action(s); and

vii. each rolling, 12-month period during which the total OC emissions from this emissions unit exceeded 1.16 tons.

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

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

(3) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart PPPP.

(4) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

f) Testing Requirements

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

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

VOC emissions shall not exceed 0.61 pound per hour (lb/hr), excluding cleanup materials (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method:

The hourly emission limitation was established by multiplying the maximum VOC content of the coating used in the source (6.09 lbs VOC/gallon of coating) by the coating's maximum usage in any hour (2.0 gallons) and crediting for the control efficiency using the following calculations:

VOC emissions/hr = (maximum VOC content of coating) x (maximum coating usage in one hour) x (1-CE*)

* CE = control efficiency (95%)

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, method 18, 25 or 25A.

b. Emissions Limitation:

PE shall not exceed 0.26 lb/hr and 1.14TPY (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method:

The hourly emission limitation was established by multiplying the maximum PE content of the coating used in the source (7.34 lbs PE/gallon of coating) by the coating's maximum usage in any hour (2.0 gallons) and crediting for transfer and control efficiency using the following calculations:

PE emissions/hr = (maximum PE content of coating) x (maximum coating usage in one hour) x (1-TE*) x (1-CE**)

* TE = transfer efficiency (65%)
** CE = control efficiency (95% for dry filtration)

The annual emission limitation was established by multiplying the hourly limitation by 8,760 hours/year and then dividing by 2,000 pounds/ton. Compliance with the annual emission limitation may be assumed as long as compliance with the hourly emission limitation is maintained.

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, method 5.

c. Emissions Limitation:

VOC emissions shall not exceed 3.27 tons per rolling, 12-month period, including cleanup materials.

Applicable Compliance Method:

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

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 3 months after start-up;

b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for volatile organic compounds;

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Method 18, Method 25 or Method 25A of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency;

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s);

f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment; and

g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

(3) The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

(4) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in 3745-21-10 or an alternative test protocol approved by the Ohio EPA. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

(5) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart PPPP.

(6) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

g) Miscellaneous Requirements

(1) None.