

5/16/2012

Certified Mail

Mr. Terrell Coleman
Airstream, Inc.
419 West Pike Street
Jackson Center, OH 45334

Facility ID: 0575000095
Permit Number: P0108279
County: Shelby

RE: DRAFT AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

A draft of the OAC Chapter 3745-77 Title V permit for the referenced facility has been issued. The purpose of this draft is to solicit public comments. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Sidney Daily News. A copy of the public notice, the Statement of Basis, 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, Southwest District Office
401 East Fifth Street
Dayton, OH 45402

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Ohio EPA DAPC, Southwest District Office at (937)285-6357.

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-SWDO; Indiana

PUBLIC NOTICE
5/16/2012 Issuance of Draft Air Pollution Title V Permit

Airstream, Inc.
419 West Pike Street,
Jackson Center, OH 45334
Shelby County

FACILITY DESC.: Other Motor Vehicle Electrical and Electronic Equipment Manufacturing

PERMIT #: P0108279

PERMIT TYPE: Renewal

PERMIT DESC: Renewal of Title V for recreational vehicle manufacturing facility which contains five coating lines and three processes.

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



Statement of Basis for Air Pollution Title V Permit

Facility ID:	0575000095
Facility Name:	Airstream, Inc.
Facility Description:	Manufactures recreational vehicles
Facility Address:	419 West Pike Street, Jackson Center, OH 45334
Permit #:	P0108279, Renewal

This facility is subject to Title V because it is major for:

- Lead
 Sulfur Dioxide
 Carbon Monoxide
 Volatile Organic Compounds
 Nitrogen Oxides
 Particulate Matter ≤ 10 microns
 Single Hazardous Air Pollutant
 Combined Hazardous Air Pollutants
 Maximum Available Control Technology Standard(s)

A. Standard Terms and Conditions

Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?	No
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	No
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	<p>On May 12, 2010, Permit to Install, (PTI) P0106326, was issued final to cover the installation of an aluminum CNC router w/ a high efficiency cyclone, emissions unit P005. Since the router's uncontrolled emissions would be over 10 pounds per day, it was not able to be listed as a "de minimis" emissions unit as defined under OAC rule 3745-15-05.</p> <p>Under OAC rule 3745-77-01(V), an "insignificant" emissions unit has an "<i>uncontrolled potential emissions of five tons or less per year of any regulated air pollutant.</i>" Although the controlled emissions are estimated to be only 0.25 tons of PE/PM₁₀ per year, the uncontrolled potential is 12.5 tons per year; therefore, emissions unit P005 cannot be defined as "insignificant" in this Title V modification.</p>
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A



Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	Although the existing Title V does not expire until Nov. 14, 2013, this facility has requested that this Title V application to address the installation and operation of emissions unit P005, which is covered under PTI P0106326, be treated as their renewal application. This will help minimize the time and paper work that the company would need to start organizing within the next 12 months for the scheduled renewal and eliminate redundant work for both this agency and Airstream.

B. Facility-Wide Terms and Conditions

Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
1.a)	-15-05		State only enforceable "de minimis" section as B.2.b).
2.a)	-31-03, -77-01(V)		Either exempt by rule or insignificant emissions units. This facility has only 1, B001, < 10 mmbtu boiler.
2.b)	-15-05		"deminimis" emissions unit. Facility has two adhesive operations.

C. Emissions Unit Terms and Conditions

<p>Key: EU = emissions unit ID ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit) OR = operational restriction M = monitoring requirements St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement ENF = did noncompliance issues drive the monitoring requirements? R = record keeping requirements Rp = reporting requirements ET = emission testing requirements (not including compliance method terms) Misc = miscellaneous requirements</p>															
EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
K002, West Spray Booth	VOC emissions shall not exceed 3.5 pounds per hour, excluding cleanup materials	31-05(A)(3)		N	N	N	N	N	Y	N	Y	N	Y	N	
	VOC content shall not exceed 3.5 pounds per gallon of coating,			N	Y	N	N	N	Y	N	Y	N	N	N	



excluding water and exempt solvent and 3.04 lbs/ gallon of liquid organic cleanup materials.															
Emissions from natural gas combustion in the drying oven (0.99 mmBtu/hr)			N	Y	N	N	N	Y	N	Y	N	N	N		
VOC emissions shall not exceed 16.85 tons per rolling, 12-month summation with cleanup materials	31-05(D)		N	N	N	N	N	Y	N	Y	N	N	N	Allows facility some flexibility on cleanup usage, reduces work hours and paper work needed to assume compliance and track cleanup usage.	
PE from burning natural gas shall not exceed 0.020 lbs./ mmBtu actual heat input	-17-10		N	N	N	N	N	N	N	N	N	N	N	Compliance is based on the use of natural gas	
Visible Particulate Emissions (PE) shall not exceed 20% as a six-minute average, except as provided by rule.	-17-07		N	N	N	N	N	N	N	N	N	Y	N	If required, compliance with the visible emission limitation shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).	
Ohio Toxic Rule	-114-01		N	N	N	N	N	Y	N	N	N	N	N	Review included Ethyl benzene, ethylene glycol mono-butyl ether acetate, xylene, and VMP naphtha	
emission unit shall be equipped with a filter system that shall minimize or eliminate all particulate emissions from the painting operation	-17-11(C)		N	Y	Y	N	N	Y	N	Y	N	N	N		

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
K003, East Spray Booth	VOC emissions shall not exceed 3.5 pounds per hour, excluding cleanup materials	31-05(A)(3)		N	N	N	N	N	Y	N	Y	N	Y	N	
	VOC content shall not exceed 3.5 pounds per gallon of coating, excluding water and exempt solvent and 3.04 lbs/ gallon of			N	Y	N	N	N	Y	N	Y	N	N	N	



	liquid organic cleanup materials.															
	Emissions from natural gas combustion in the drying oven (0.99 mmBtu/hr)			N	Y	N	N	N	Y	N	Y	N	N	N		
	VOC emissions shall not exceed 16.85 tons per rolling, 12-month summation with cleanup materials	31-05(D)		N	N	N	N	N	Y	N	Y	N	N	N		Allows facility some flexibility on cleanup usage, reduces work hours and paper work needed to assume compliance and track cleanup usage.
	PE from burning natural gas shall not exceed 0.020 lbs./ mmBtu actual heat input	-17-10		N	N	N	N	N	N	N	N	N	N	N		Compliance is based on the use of natural gas
	Visible Particulate Emissions (PE) shall not exceed 20% as a six-minute average, except as provided by rule.	-17-07		N	N	N	N	N	N	N	N	N	Y	N		If required, compliance with the visible emission limitation shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).
	Ohio Toxic Rule	-114-01		N	N	N	N	N	Y	N	N	N	N	N		Review included Ethyl benzene, ethylene glycol mono-butyl ether acetate, xylene, and VMP naphtha
	emission unit shall be equipped with a filter system that shall minimize or eliminate all particulate emissions from the painting operation	-17-11(C)		N	Y	Y	N	N	Y	N	Y	N	N	N		

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	<u>Comments</u>
		SIP (3745-)	Other												
K004, East backup Spray Booth	VOC emissions shall not exceed 3.5 pounds per hour, excluding cleanup materials	31-05(A)(3)		N	N	N	N	N	Y	N	Y	N	Y	N	
	VOC content shall not exceed 3.5 pounds per gallon of coating, excluding water and exempt solvent and 3.04 lbs/ gallon of liquid organic cleanup materials.			N	Y	N	N	N	Y	N	Y	N	N	N	



	Emissions from natural gas combustion in the drying oven (0.99 mmBtu/hr)			N	Y	N	N	N	Y	N	Y	N	N	N	
	VOC emissions shall not exceed 16.85 tons per rolling, 12-month summation with cleanup materials	31-05(D)		N	N	N	N	N	Y	N	Y	N	N	N	Allows facility some flexibility on cleanup usage, reduces work hours and paper work needed to assume compliance and track cleanup usage.
	PE from burning natural gas shall not exceed 0.020 lbs./ mmBtu actual heat input	-17-10		N	N	N	N	N	N	N	N	N	N	N	Compliance is based on the use of natural gas
	Visible Particulate Emissions (PE) shall not exceed 20% as a six-minute average, except as provided by rule.	-17-07		N	N	N	N	N	N	N	N	N	Y	N	If required, compliance with the visible emission limitation shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).
	Ohio Toxic Rule	-114-01		N	N	N	N	N	Y	N	N	N	N	N	Review included Ethyl benzene, ethylene glycol mono-butyl ether acetate, xylene, and VMP naphtha
	emission unit shall be equipped with a filter system that shall minimize or eliminate all particulate emissions from the painting operation	-17-11(C)		N	Y	Y	N	N	Y	N	Y	N	N	N	

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
K006, For window parts in Building 103	VOC emissions shall not exceed 3.5 pounds per hour, excluding cleanup materials	31-05(A)(3)		N	N	N	N	N	Y	N	Y	N	Y	N	
	VOC content shall not exceed 3.5 pounds per gallon of coating, excluding water and exempt solvent and 3.04 lbs/ gallon of liquid organic cleanup materials.			N	Y	N	N	N	Y	N	Y	N	N	N	
	Emissions from natural gas combustion in the drying oven			N	Y	N	N	N	Y	N	Y	N	N	N	



(0.99 mmBtu/hr)																
VOC emissions shall not exceed 16.85 tons per rolling, 12-month summation with cleanup materials	31-05(D)		N	N	N	N	N	N	Y	N	Y	N	N	N		Allows facility some flexibility on cleanup usage, reduces work hours and paper work needed to assume compliance and track cleanup usage.
PE from burning natural gas shall not exceed 0.020 lbs./ mmBtu actual heat input	-17-10		N	N	N	N	N	N	N	N	N	N	N	N		Compliance is based on the use of natural gas
Visible Particulate Emissions (PE) shall not exceed 20% as a six-minute average, except as provided by rule.	-17-07		N	N	N	N	N	N	N	N	N	N	Y	N		If required, compliance with the visible emission limitation shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).
Ohio Toxic Rule	-114-01		N	N	N	N	N	N	Y	N	N	N	N	N		Review included Butyl Acetate, Toluene, and Xylene.
emission unit shall be equipped with a filter system that shall minimize or eliminate all particulate emissions from the painting operation	-17-11(C)		N	Y	Y	N	N	N	Y	N	Y	N	N	N		

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
P002, Wood Shop/Bldg. 102	2.40 lbs of particulate emissions (PE)/ hour	17-11(B)(2)		N	N	N	N	N	N	N	N	N	Y	N	
	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.	17-07(A)		N	N	N	N	N	Y	N	Y	N	y	N	If required, compliance with the visible emissions limitation above shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1)

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
P004,	OC content of the paint stripping	31-05(A)(3)		N	N	N	N	N	Y	N	Y	N	Y	N	



Paint Stripping Area in Bldg. #103	materials shall not exceed 10.0 lbs/gallon, as applied.															
	OC content of cleanup materials not exceed 6.57 lbs/gallon, as applied			N	N	N	N	N	Y	N	Y	N	Y	N		
	use of any PRM, as defined in OAC rule 3745-21-01(C)(5), is prohibited.			N	N	N	N	N	Y	N	Y	N	Y	N		
	Total combined OC from the stripping and cleanup operations shall not exceed 6.23 tons per rolling, 12-month period	31-05(D)		N	Y	N	N	N	Y	N	Y	N	Y	N		
	Ohio Toxic Rule	-114-01		N	N	N	N	N	Y	N	N	N	N	N		Review included Methylene Chloride

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
P005, Aluminum CNC Router	The use of an add-on air pollution control device.			N	Y	N	N	N	Y	N	Y	N	N	N	
	(PE) from this emissions unit shall not exceed 1.3 pounds per hour.	17-11(B)(1) Table I		N	N	N	N	N	N	N	N	N	Y	N	
	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.	17-07(A)		N	N	N	N	N	Y	N	Y	N	y	N	If required, compliance with the visible emissions limitation above shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1)
	< 10 ton per year BAT exemption	31-05(A)(3)(a)(ii), as effective 12/01/06		N	N	N	N	N	N	N	N	N	N	N	State only until and if SIP is modified to allow for BAT exemptions

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
R001, Glue	PE shall not exceed 0.551 lb PE/hr	17-11(B)		N	N	N	N	N	N	N	N	N	Y	N	
	Visible PE shall not exceed 20%	17-07(A)		N	N	N	N	N	Y	N	Y	N	y	N	If required, compliance with



&Staining Spray Booth - Building 102	opacity, as a six-minute average, except as provided by rule.															the visible emissions limitation above shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1)
	emission unit shall be equipped with a filter system that shall minimize or eliminate all particulate emissions from the painting operation	17-11(C)		N	Y	Y	N	N	Y	N	Y	N	N	N		
	Exempt from OC requirements under OAC 3745-21-07(G)	21-06		Y	N	N	N	N	N	N	N	N	N	N		Facility is not in a Priority I county and the EU



DRAFT

**Division of Air Pollution Control
Title V Permit
for
Airstream, Inc.**

Facility ID:	0575000095
Permit Number:	P0108279
Permit Type:	Renewal
Issued:	5/16/2012
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Title V Permit
for
Airstream, Inc.

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Authorization

Facility ID: 0575000095
Facility Description: Manufactures recreational vehicles
Application Number(s): A0041553
Permit Number: P0108279
Permit Description: Renewal of Title V for recreational vehicle manufacturing facility which contains five coating lines and three processes.
Permit Type: Renewal
Issue Date: 5/16/2012
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0088832

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Airstream, Inc.
419 West Pike Street
Jackson Center, OH 45334

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

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

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Southwest District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director



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. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
 - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
 - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting
 - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(Authority for term: ORC 3704.036(A))

2. 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 (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), 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.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

- 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 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.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

- c) The permittee shall submit required reports in the following manner:
- (1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- (2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive

Effective Date: To be entered upon final issuance

measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- (3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the



insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

- (4) 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

- (5) Reports of any required monitoring and/or record keeping information shall be submitted to Ohio EPA DAPC, Southwest District Office.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:



- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. 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.

(Authority for term: OAC rule 3745-77-07(A)(5))

6. 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.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. 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, in accordance with Standard Term and Condition A.11 below. 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.

- (1) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when: the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable; or a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. 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.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. 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.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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:
 - (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 paragraph (E) of OAC rule 3745-77-03. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (3) 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:
- (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.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
- (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.
 - (2) Compliance certifications shall include the following:
 - a. An identification of each term or condition of this permit that is the basis of the certification.
 - b. The permittee's current compliance status.
 - c. Whether compliance was continuous or intermittent.
 - d. The method(s) used for determining the compliance status of the source currently and over the required reporting period.
 - e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
 - (3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

- a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that



qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

- c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))



21. 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.

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible 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 responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

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

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))



24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or record keeping 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 (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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.)

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.

25. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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 verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

(Authority for term: OAC rule 3745-77-07(C))

26. 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 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. 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 emissions unit(s) that is (are) served by such control system(s).

27. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or
- c) where the company's responsible official has certified that an emissions unit has been permanently shut down.

B. Facility-Wide Terms and Conditions



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) Sections B.2., 3. and 4.
2. The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 tons per year (TPY) for any individual HAP and 24.9 TPY for the combination of all HAPs, based upon rolling, 12-month summations.

[Authority for term: OAC rule 3745-77-07(A)(1)]
3. The permittee shall collect and record the following information each month for this facility:
 - a) the company identification for each HAP-emitting material (i.e., all HAP-containing coatings, clean-up materials, resins, adhesives, potting compounds, plating chemicals, etc.);
 - b) the individual HAP content of each HAP emitting material;
 - c) the total combined HAP content of each HAP emitting material (i.e. sum of individual HAP contents from b);
 - d) the amount of each HAP emitting material employed during the previous calendar month;
 - e) the hours of operation, or other emissions determining rationale, of all HAP-generating sources (e.g., fuel combustion, sanding/grinding operations, plating);
 - f) the total individual HAP emissions from all HAP-emitting materials employed and all HAP-generating sources, in pounds or tons per month;
 - g) the total combined HAP emissions from all HAP emitting materials employed and all HAP-generating sources, in pounds or tons per month;
 - h) the rolling, 12-month summation of individual HAP emissions from all HAP-emitting materials employed and all HAP-generating sources, in tons; and
 - i) the rolling, 12-month summation of total combined HAP emissions from all HAP-emitting materials employed and all HAP-generating sources, in tons.

[Authority for term: OAC rule 3745-77-07(A)(1)]



4. The permittee shall submit quarterly deviation (excursion) reports for the following emissions unit(s) that identify:
- a) all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - (1) The rolling 12 individual HAP emissions is greater than 9.9 tons from this facility; and
 - (2) The rolling 12 month combined HAP's emissions are greater than 24.9 tons from this facility.
 - b) the probable cause of each deviation (excursion);
 - c) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d) the magnitude and duration of each deviation (excursion).

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

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

[Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-15-03(B)(1)(b), and OAC rule 3745-15-03(C)]

C. Emissions Unit Terms and Conditions



1. K002, West Spray Booth

Operations, Property and/or Equipment Description:

West Spray Booth, Miscellaneous Metal Coating Operation w/ natural gas fired 1.2 mmbtu/hr drying ovens

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) b)(1)f., d)(8), d)(9) and d)(10).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions shall not exceed 3.5 pounds per hour, excluding cleanup materials.</p> <p>VOC content shall not exceed 3.5 pounds per gallon of coating, excluding water and exempt solvent and 3.04 lbs/ gallon of liquid organic cleanup materials.</p> <p>Emissions from natural gas combustion in the drying oven (1.2 mmBtu/hr):</p> <p>0.12 lbs/hr and 0.43 tons/yrNOx; 0.1 lb/hr and 0.36 tons/yr CO; 0.002 lb/hr and 0.01 ton/yr filterable PM; 0.007 lb/hr and 0.03 ton/yr VOC; and 0.0001 lb/hr and 0.0004 ton/yr SO2.</p> <p>Compliance with OAC rule 3745-31-05(A)(3) also includes compliance with the requirements of OAC rule 3745-31-05(D), 3745-21-09(U), 3745-17-10, and 3745-17-07(A).</p> <p>See section b)(2)a., below.</p>
b.	OAC rule 3745-31-05(D)	VOC emissions shall not exceed 16.85 tons per rolling, 12-month summation with cleanup materials.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-21-09(U)	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
d..	OAC rule 3745-17-10	The maximum allowable particulate emissions for the burning natural gas is the drying oven shall not exceed 0.020 pound per million Btu of actual heat input
e.	OAC rule 3745-17-07(A)	Visible Particulate Emissions (PE) shall not exceed 20% as a six-minute average, except as provided by rule.
f.	OAC rule 3745-114-01	Ohio Toxic Rule See sections d)(8), d)(9) and d)(10), below.
g.	OAC rule 3745-17-11(C)	Use of an overspray control system.

(2) Additional Terms and Conditions

- a. The hourly emission limitation for VOC of 3.5 pounds is established to reflect potential to emit for this emission unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.

[Authority for term: OAC rule 3745-77-07(A)(1), and OAC rule 3745-31-05(A)(3)]

- b. The particulate matter emission limit is derived based on the equation noted with Table 1 from OAC Rule 3745-11. Figure II does not apply (per OAC rule 3745-17-11(A)(2)(a)(i)) because the uncontrolled mass rate of particulate emissions cannot be determined.

[Authority for term: OAC rule 3745-17-11(A)(2)(a)(i)]

- c. The permittee shall operate the filter system for the coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual, with any modifications deemed necessary by the permittee. The filter system shall be employed during all periods of coating application to control particulate emissions.

[Authority for term: OAC rule 3745-17-07(C)]

c) Operational Restrictions

- (1) The permittee shall burn only natural gas in this emission unit.

[Authority for term: OAC rule 3745-77-07(A)(1), and OAC rule 3745-31-05(A)(3)]

- (2) Coating and Liquid Organic Cleanup Materials employed in this emission unit shall not exceed: 8760 gallons per rolling 12-month period; and 1000 gallons per rolling 12-month period, respectively.

[Authority for term: OAC rule 3745-77-07(A)(1), and OAC rule 3745-31-05(A)(3)]

- (3) This emission unit shall be equipped with a filter system that shall minimize or eliminate all particulate emissions from the painting operation.

[Authority for term: OAC rule 3745-77-07(A)(1), and OAC rule 3745-17-11(C)]

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

- (1) The permittee shall collect and record the following information each month for the line:

- a. the name and identification number of each coating, as applied; and
- b. the VOC content of each coating (excluding water and exempt solvents), as applied.

[Authority for term: OAC rule 3745-77-07(C)(1), and OAC rule 3745-31-05(A)(3)]

- (2) The permittee shall collect and record the following information for each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed
- b. the VOC content of each cleanup material, in pounds per gallon;
- c. the number of gallons of each cleanup material employed;
- d. the number of gallons (excluding water and exempt solvents) of each coating employed; the total VOC emissions from all coatings and cleanup materials employed, in tons; and
- e. the 12-month rolling total VOC emissions from all coatings and cleanup materials employed, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1), and OAC rule 3745-31-05(A)(3)]

- (3) The permittee shall maintain records on any time that fuel other than natural gas is employed in the drying oven.

[Authority for term: OAC rule 3745-77-07(C)(1), and OAC rule 3745-31-05(A)(3)]

- (4) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the filter system with any modifications deemed necessary by the permittee during the time period in which the filter is utilized. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for term: OAC rule 3745-77-07(C)(1), and OAC rule 3745-17-11(C)]

- (5) The permittee shall conduct periodic inspections of the filter system 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. The periodic inspections of the filter system shall be performed at a frequency that is based upon the recommendation of the manufacturer, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, the permittee shall conduct a comprehensive inspection of the filter system, not less than once each calendar year, while the emissions unit is shut down; and shall perform any needed maintenance and repair for the control device to ensure that it is operated in accordance with the manufacturer's recommendations.

[Authority for term: OAC rule 3745-77-07(C)(1), and OAC rule 3745-17-11(C)]

- (6) The permittee shall document each inspection of the filter system by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the 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.

[Authority for term: OAC rule 3745-77-07(C)(1), and OAC rule 3745-17-11(C)]

- (7) In the event that the filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the filter system shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain a record of those periods when the filter system is not operating in accordance with such requirements. These records shall be maintained at the facility for not less than five years from the date of completion and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for term: OAC rule 3745-77-07(C)(1), and OAC rule 3745-17-11(C)]

- (8) The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application. The predicted 1-hour Maximum In-Stack concentration 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: Acetone

TLV (ppm): 500

Maximum Hourly Emission Rate (lbs/hr): 1.95



Predicted 1-Hour Maximum In-Stack Concentration (ppm): 0.651

MAGLC (ppm): 11.90

Pollutant: Butyl Acetate

TLV (ppm): 150

Maximum Hourly Emission Rate (lbs/hr): 1.66

Predicted 1-Hour Maximum In-Stack Concentration (ppm): 0.553

MAGLC (ppm): 3.57

Pollutant: Ethyl Benzene

TLV (ppm): 100

Maximum Hourly Emission Rate (lbs/hr): 0.06

Predicted 1-Hour Maximum In-Stack Concentration (ppm): 0.02

MAGLC (ppm): 2.38

Pollutant: Ethylene Glycol Monobutyl Ether Acetate

TLV (ppm): 5

Maximum Hourly Emission Rate (lbs/hr): 0.06

Predicted 1-Hour Maximum In-Stack Concentration (ppm): 0.02

MAGLC (ppm): 0.12

Pollutant: Xylene

TLV (ppm): 100

Maximum Hourly Emission Rate (lbs/hr): 1.11

Predicted 1-Hour Maximum In-Stack Concentration (ppm): 0.37

MAGLC (ppm): 2.38

Pollutant: Heptane

TLV (ppm): 400

Maximum Hourly Emission Rate (lbs/hr): 0.13

Predicted 1-Hour Maximum In-Stack Concentration (ppm): 0.04

MAGLC (ppm): 9.52

Pollutant: Methyl Isobutyl Ketone

TLV (ppm): 50

Maximum Hourly Emission Rate (lbs/hr): 0.15

Predicted 1-Hour Maximum In-Stack Concentration (ppm): 0.05

MAGLC (ppm): 1.19

Pollutant: Toluene

TLV (ppm): 50

Maximum Hourly Emission Rate (lbs/hr): 0.25

Predicted 1-Hour Maximum In-Stack Concentration (ppm): 0.08

MAGLC (ppm): 1.19

Pollutant: VM&P Naphtha

TLV (ppm): 300

Maximum Hourly Emission Rate (lbs/hr): 0.70

Predicted 1-Hour Maximum In-Stack Concentration (ppm): 0.24

MAGLC (ppm): 7.14

Pollutant: Methyl Propyl Ketone

TLV (ppm): 200

Maximum Hourly Emission Rate (lbs/hr): 0.01

Predicted 1-Hour Maximum In-Stack Concentration (ppm): 0.18

MAGLC (ppm): 4.76

[Authority for term: OAC rule 3745-114-01]

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

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

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

[Authority for term: OAC rule 3745-114-01]

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

[Authority for term: OAC rule 3745-114-01]

e) **Reporting Requirements**

- (1) The permittee shall submit quarterly deviation reports that identify the following:
 - a. all exceedances of the rolling, 12-month period coating usage limitation of 8,760 gallons excluding water and exempt solvents;
 - b. all exceedances of coating VOC content of 3.5 lbs/gal;
 - c. all exceedances of the rolling, 12-month period cleaning solvent usage limitation of 1,000 gallons;



- d. all exceedances of liquid clean up VOC content of 3.04 lbs/gal; and/or
- e. all exceedances of the rolling, 12-month period VOC emission limitation of 16.85 tons.

These quarterly deviation reports are due by the dates specified in the standard terms and conditions of this permit.

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C) and OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Southwest District Office, Division of Air Pollution Control) within 30 days following the end of the calendar month.

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C) and OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C) and OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall include in the quarterly report any record of the date and length of time the filter system was not in service during coating application. The quarterly report shall be submitted by January 31st, April 30th, July 31st, and October 31st of each year to the Ohio EPA Southwest District Office, Division of Air Pollution Control.

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C) and OAC rule 3745-77-07(C)(1)]

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

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C) and OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

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

- a. Emission Limitation:

16.85 tons of VOC per rolling, 12-month period

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Section d), of this permit.

Formulation data or Method 24 of 40 CFR, Part 60, Appendix A, shall be used to determine the organic compound contents of the materials employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

The VOC content of the coating materials employed in this emissions unit shall not exceed 3.5 lbs/gallon, as applied.

The VOC content of liquid organic cleanup materials employed in this emissions unit shall not exceed 3.04 lbs/gallon, as applied.

Applicable Compliance Method:

Formulation data or Method 24 of 40 CFR, Part 60, Appendix A, shall be used to demonstrate compliance with the organic compound content limitations.

[Authority for term: OAC rule 3745-77-07(C)(1)]

c. Emissions Limitation:

0.020 pound per million Btu of actual heat input

Applicable Compliance Method:

Compliance shall be based on the use of natural gas and the record keeping in section d) of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

d. Emissions from natural gas usage in the drying oven shall not exceed the following:

0.12 lbNO_x/hr and 0.53 tons NO_x/yr;

0.1 lb CO/hr and 0.44 tons CO/yr;

0.002 lb PE/hr (filterable) and 0.01 ton PE/yr (filterable);

0.007 lb VOC/hr; and 0.03 ton VOC/yr; and

0.0001 lb SO₂/hr; and 0.0004 ton SO₂/yr

The above limitations are based on the following equation:

$$HER = (Bi / 1000 \text{ btu/cu ft}) \times Ef$$



$$AER = [HER \times 8760] / 2000$$

Where:

HER = Hourly emission rate, in pounds per hour;

AER = Annual emissions rate, in tons per year;

Bi = Burner heat input, in mmbtu/hr, (1.2 from EAC form); and

Ef = Emissions factor, in pounds emitted per mmscf:

100 pounds of NOx, (AP-42, Table 1.4-1);

84 pounds of CO, (AP-42, Table 1.4-1);

1.9 pounds of PE filterable, (AP_42, Table 1.4-2);

5.5 pounds of VOC, (AP_42, Table 1.4-2); and

0.6 pounds of SO2, (AP_42, Table 1.4-2);

Applicable Compliance Method:

Compliance shall be based on the use of natural gas as fuel in the drying oven and the record keeping established in section d) of this permit.. Prior to any modifications that would increase the hourly potential and/or change the type of fuel in the drying oven; the permittee shall apply for and obtain all appropriate air pollution permits.

[Authority for term: OAC rule 3745-77-07(C)(1)]

e. Emission Limitation:

Visible Particulate Emissions (PE) shall not exceed 20% as a six-minute average, except as provided by rule.

Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

- (1) None.



2. K003, East Spray Booth

Operations, Property and/or Equipment Description:

East Spray Booth, Miscellaneous Metal Coating w/ natural gas fired 1.2 mmbtu/hr drying ovens

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) b)(1)f., d)(8), d)(9) and d)(10).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions shall not exceed 3.5 pounds per hour, excluding cleanup materials.</p> <p>VOC content shall not exceed 3.5 pounds per gallon of coating, excluding water and exempt solvent and 3.04 lbs/ gallon of liquid organic cleanup materials.</p> <p>Emissions from natural gas combustion in the drying oven (1.2 mmBtu/hr):</p> <p>0.12 lbs/hr and 0.43 tons/yrNO_x; 0.1 lb/hr and 0.36 tons/yr CO; 0.002 lb/hr and 0.01 ton/yr filterable PM; 0.007 lb/hr and 0.03 ton/yr VOC; and 0.0001 lb/hr and 0.0004 ton/yr SO₂.</p> <p>Compliance with OAC rule 3745-31-05(A)(3) also includes compliance with the requirements of OAC rule 3745-31-05(D), 3745-21-09(U), 3745-17-10, and 3745-17-07(A).</p> <p>See section b)(2)a., below.</p>
b.	OAC rule 3745-31-05(D)	VOC emissions shall not exceed 16.85 tons per rolling, 12-month summation with cleanup materials.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-21-09(U)	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
d..	OAC rule 3745-17-10	The maximum allowable particulate emissions for the burning natural gas is the drying oven shall not exceed 0.020 pound per million Btu of actual heat input
e.	OAC rule 3745-17-07(A)	Visible Particulate Emissions (PE) shall not exceed 20% as a six-minute average, except as provided by rule.
f.	OAC rule 3745-114-01	Ohio Toxic Rule See sections d)(8), d)(9) and d)(10), below.
g.	OAC rule 3745-17-11(C)	Use of a overspray control system.

(2) Additional Terms and Conditions

- a. The hourly emission limitation for VOC of 3.5 pounds is established to reflect potential to emit for this emission unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.

[Authority for term: OAC rule 3745-77-07(A)(1), and OAC rule 3745-31-05(A)(3)]

- b. The particulate matter emission limit is derived based on the equation noted with Table 1 from OAC Rule 3745-11. Figure II does not apply (per OAC rule 3745-17-11(A)(2)(a)(i)) because the uncontrolled mass rate of particulate emissions cannot be determined.

[Authority for term: OAC rule 3745-17-11(A)(2)(a)(i)]

- c. The permittee shall operate the filter system for the coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual, with any modifications deemed necessary by the permittee. The filter system shall be employed during all periods of coating application to control particulate emissions.

[Authority for term: OAC rule 3745-17-07(C)]

c) Operational Restrictions

- (1) The permittee shall burn only natural gas in this emission unit.

[Authority for term: OAC rule 3745-77-07(A)(1), and OAC rule 3745-31-05(A)(3)]

- (2) Coating and Liquid Organic Cleanup Materials employed in this emission unit shall not exceed: 8760 gallons per rolling 12-month period; and 1000 gallons per rolling 12-month period, respectively.

[Authority for term: OAC rule 3745-77-07(A)(1), and OAC rule 3745-31-05(A)(3)]

- (3) This emission unit shall be equipped with a filter system that shall minimize or eliminate all particulate emissions from the painting operation.

[Authority for term: OAC rule 3745-77-07(A)(1), and OAC rule 3745-17-11(C)]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for the line:

- a. the name and identification number of each coating, as applied; and
- b. the VOC content of each coating (excluding water and exempt solvents), as applied.

[Authority for term: OAC rule 3745-77-07(C)(1), and OAC rule 3745-31-05(A)(3)]

- (2) The permittee shall collect and record the following information for each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed
- b. the VOC content of each cleanup material, in pounds per gallon;
- c. the number of gallons of each cleanup material employed;
- d. the number of gallons (excluding water and exempt solvents) of each coating employed; the total VOC emissions from all coatings and cleanup materials employed, in tons; and
- e. the 12-month rolling total VOC emissions from all coatings and cleanup materials employed, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1), and OAC rule 3745-31-05(A)(3)]

- (3) The permittee shall maintain records on any time that fuel other than natural gas is employed in the drying oven.

[Authority for term: OAC rule 3745-77-07(C)(1), and OAC rule 3745-31-05(A)(3)]

- (4) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the filter system with any modifications deemed necessary by the permittee during the time period in which the filter is utilized. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for term: OAC rule 3745-77-07(C)(1), and OAC rule 3745-17-11(C)]

- (5) The permittee shall conduct periodic inspections of the filter system 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. The periodic inspections of the filter system shall be performed at a frequency that is based upon the recommendation of the manufacturer, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, the permittee shall conduct a comprehensive inspection of the filter system, not less than once each calendar year, while the emissions unit is shut down; and shall perform any needed maintenance and repair for the control device to ensure that it is operated in accordance with the manufacturer's recommendations.

[Authority for term: OAC rule 3745-77-07(C)(1), and OAC rule 3745-17-11(C)]

- (6) The permittee shall document each inspection of the filter system by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the 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.

[Authority for term: OAC rule 3745-77-07(C)(1), and OAC rule 3745-17-11(C)]

- (7) In the event that the filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the filter system shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain a record of those periods when the filter system is not operating in accordance with such requirements. These records shall be maintained at the facility for not less than five years from the date of completion and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for term: OAC rule 3745-77-07(C)(1), and OAC rule 3745-17-11(C)]

- (8) The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application. The predicted 1-hour Maximum In-Stack concentration 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: Acetone

TLV (ppm): 500

Maximum Hourly Emission Rate (lbs/hr): 1.95

Predicted 1-Hour Maximum In-Stack Concentration (ppm): 0.651

MAGLC (ppm): 11.90

Pollutant: Butyl Acetate

TLV (ppm): 150

Maximum Hourly Emission Rate (lbs/hr): 1.66

Predicted 1-Hour Maximum In-Stack Concentration (ppm): 0.553

MAGLC (ppm): 3.57

Pollutant: Ethyl Benzene

TLV (ppm): 100

Maximum Hourly Emission Rate (lbs/hr): 0.06

Predicted 1-Hour Maximum In-Stack Concentration (ppm): 0.02

MAGLC (ppm): 2.38

Pollutant: Ethylene Glycol Monobutyl Ether Acetate

TLV (ppm): 5

Maximum Hourly Emission Rate (lbs/hr): 0.06

Predicted 1-Hour Maximum In-Stack Concentration (ppm): 0.02

MAGLC (ppm): 0.12

Pollutant: Xylene

TLV (ppm): 100

Maximum Hourly Emission Rate (lbs/hr): 1.11

Predicted 1-Hour Maximum In-Stack Concentration (ppm): 0.37

MAGLC (ppm): 2.38

Pollutant: Heptane



TLV (ppm): 400

Maximum Hourly Emission Rate (lbs/hr): 0.13

Predicted 1-Hour Maximum In-Stack Concentration (ppm): 0.04

MAGLC (ppm): 9.52

Pollutant: Methyl Isobutyl Ketone

TLV (ppm): 50

Maximum Hourly Emission Rate (lbs/hr): 0.15

Predicted 1-Hour Maximum In-Stack Concentration (ppm): 0.05

MAGLC (ppm): 1.19

Pollutant: Toluene

TLV (ppm): 50

Maximum Hourly Emission Rate (lbs/hr): 0.25

Predicted 1-Hour Maximum In-Stack Concentration (ppm): 0.08

MAGLC (ppm): 1.19

Pollutant: VM&P Naphtha

TLV (ppm): 300

Maximum Hourly Emission Rate (lbs/hr): 0.70

Predicted 1-Hour Maximum In-Stack Concentration (ppm): 0.24

MAGLC (ppm): 7.14

Pollutant: Methyl Propyl Ketone

TLV (ppm): 200

Maximum Hourly Emission Rate (lbs/hr): 0.01

Predicted 1-Hour Maximum In-Stack Concentration (ppm): 0.18

MAGLC (ppm): 4.76

[Authority for term: OAC rule 3745-114-01]

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

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

[Authority for term: OAC rule 3745-114-01]

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

[Authority for term: OAC rule 3745-114-01]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation reports that identify the following:
 - a. all exceedances of the rolling, 12-month period coating usage limitation of 8,760 gallons excluding water and exempt solvents;
 - b. all exceedances of coating VOC content of 3.5 lbs/gal;
 - c. all exceedances of the rolling, 12-month period cleaning solvent usage limitation of 1,000 gallons;
 - d. all exceedances of liquid clean up VOC content of 3.04 lbs/gal; and/or
 - e. all exceedances of the rolling, 12-month period VOC emission limitation of 16.85 tons.

These quarterly deviation reports are due by the dates specified in the standard terms and conditions of this permit.

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C) and OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Southwest District Office, Division of Air Pollution Control) within 30 days following the end of the calendar month.

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C) and OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C) and OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall include in the quarterly report any record of the date and length of time the filter system was not in service during coating application. The quarterly report shall be submitted by January 31st, April 30th, July 31st, and October 31st of each year to the Ohio EPA Southwest District Office, Division of Air Pollution Control.

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C) and OAC rule 3745-77-07(C)(1)]

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



[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C) and OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

(1) Compliance with the emission limitation in Section b)(1) of these terms and conditions shall be determined in accordance with the following method:

a. Emission Limitation:

16.85 tons of VOC per rolling, 12-month period

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Section d), of this permit.

Formulation data or Method 24 of 40 CFR, Part 60, Appendix A, shall be used to determine the organic compound contents of the materials employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

The VOC content of the coating materials employed in this emissions unit shall not exceed 3.5 lbs/gallon, as applied.

The VOC content of liquid organic cleanup materials employed in this emissions unit shall not exceed 3.04 lbs/gallon, as applied.

Applicable Compliance Method:

Formulation data or Method 24 of 40 CFR, Part 60, Appendix A, shall be used to demonstrate compliance with the organic compound content limitations.

[Authority for term: OAC rule 3745-77-07(C)(1)]

c. Emissions Limitation:

0.020 pound per million Btu of actual heat input

Applicable Compliance Method:

Compliance shall be based on the use of natural gas and the record keeping in section d) of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

d. Emissions from natural gas usage in the drying oven shall not exceed the following:

0.12 lbNO_x/hr and 0.53 tons NO_x/yr;

0.1 lb CO/hr and 0.44 tons CO/yr;

0.002 lb PE/hr (filterable) and 0.01 ton PE/yr (filterable);

0.007 lb VOC/hr; and 0.03 ton VOC/yr; and

0.0001 lb SO₂/hr; and 0.0004 ton SO₂/yr

The above limitations are based on the following equation:

$$\text{HER} = (\text{Bi} / 1000 \text{ btu/cu ft}) \times \text{Ef}$$

$$\text{AER} = [\text{HER} \times 8760] / 2000$$

Where:

HER = Hourly emission rate, in pounds per hour;

AER = Annual emissions rate, in tons per year;

Bi = Burner heat input, in mmbtu/hr, (1.2 from EAC form); and

Ef = Emissions factor, in pounds emitted per mmscf:

100 pounds of NO_x, (AP-42, Table 1.4-1);

84 pounds of CO, (AP-42, Table 1.4-1);

1.9 pounds of PE filterable, (AP_42, Table 1.4-2);

5.5 pounds of VOC, (AP_42, Table 1.4-2); and

0.6 pounds of SO₂, (AP_42, Table 1.4-2);

Applicable Compliance Method:

Compliance shall be based on the use of natural gas as fuel in the drying oven and the record keeping established in section d) of this permit. Prior to any modifications that would increase the hourly potential and/or change the type of fuel in the drying oven; the permittee shall apply for and obtain all appropriate air pollution permits.

[Authority for term: OAC rule 3745-77-07(C)(1)]

e. Emission Limitation:

Visible Particulate Emissions (PE) shall not exceed 20% as a six-minute average, except as provided by rule.



Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

1. None.



3. K004, East Back-up Spray Booth

Operations, Property and/or Equipment Description:

Chassis Paint Line - Building #103

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) b)(1)f., d)(8), d)(9) and d)(10).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions shall not exceed 3.5 pounds per hour, excluding cleanup materials.</p> <p>VOC content shall not exceed 3.5 pounds per gallon of coating, excluding water and exempt solvent and 3.04 lbs/ gallon of liquid organic cleanup materials.</p> <p>Emissions from natural gas combustion in the drying oven (0.99 mmBtu/hr):</p> <p>0.10 lbs/hr and 0.43 tons/yrNOx; 0.08 lb/hr and 0.36 tons/yr CO; 0.01 lb/hr and 0.03 ton/yr filterable PM; 0.001 lb/hr and 0.003 ton/yr SO2; and 0.01 lb/hr and 0.02 ton/yr VOC.</p> <p>Compliance with OAC rule 3745-31-05(A)(3) also includes compliance with the requirements of OAC rule 3745-31-05(D), 3745-21-09(U), 3745-17-10, and 3745-17-07(A).</p> <p>See section b)(2)a., below.</p>
b.	OAC rule 3745-31-05(D)	VOC emissions shall not exceed 16.85 tons per rolling, 12-month summation with cleanup materials.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-21-09(U)	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
d..	OAC rule 3745-17-10	The maximum allowable particulate emissions for the burning natural gas is the drying oven shall not exceed 0.020 pound per million Btu of actual heat input
e.	OAC rule 3745-17-07(A)	Visible Particulate Emissions (PE) shall not exceed 20% as a six-minute average, except as provided by rule.
f.	OAC rule 3745-114-01	Ohio Toxic Rule See sections d)(7), d)(8) and d)(9), below.
g.	OAC rule 3745-17-11(C)	Use of a overspray control system.

(2) Additional Terms and Conditions

- a. The hourly emission limitation for VOC of 3.5 pounds is established to reflect potential to emit for this emission unit. Therefore, it is not necessary to establish record keeping and reporting requirements to ensure compliance with these limitations.

[Authority for term: OAC rule 3745-77-07(A)(1), and OAC rule 3745-31-05(A)(3)]

- b. The particulate matter emission limit is derived based on the equation noted with Table 1 from OAC Rule 3745-11. Figure II does not apply (per OAC rule 3745-17-11(A)(2)(a)(i)) because the uncontrolled mass rate of particulate emissions cannot be determined.

[Authority for term: OAC rule 3745-17-11(A)(2)(a)(i)]

- c. The permittee shall operate the filter system for the coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual, with any modifications deemed necessary by the permittee. The filter system shall be employed during all periods of coating application to control particulate emissions.

[Authority for term][Authority for term: OAC rule 3745-17-07(C)]



c) Operational Restrictions

- (1) The permittee shall burn only natural gas in this emission unit.

[Authority for term: OAC rule 3745-77-07(A)(1), and OAC rule 3745-31-05(A)(3)]

- (2) Coating and Liquid Organic Cleanup Materials employed in this emission unit shall not exceed: 8760 gallons per rolling 12-month period; and 1000 gallons per rolling 12-month period, respectively.

[Authority for term: OAC rule 3745-77-07(A)(1), and OAC rule 3745-31-05(A)(3)]

- (3) This emission unit shall be equipped with a filter system that shall minimize or eliminate all particulate emissions from the painting operation.

[Authority for term: OAC rule 3745-77-07(A)(1), and OAC rule 3745-17-11(C)]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for the line:

- a. the name and identification number of each coating, as applied; and
- b. the VOC content of each coating (excluding water and exempt solvents), as applied.

[Authority for term: OAC rule 3745-77-07(C)(1), and OAC rule 3745-31-05(A)(3)]

- (2) The permittee shall collect and record the following information for each month for the purpose of determining annual VOC emissions:

- a. the name and identification of each cleanup material employed
- b. the VOC content of each cleanup material, in pounds per gallon;
- c. the number of gallons of each cleanup material employed;
- d. the number of gallons (excluding water and exempt solvents) of each coating employed; the total VOC emissions from all coatings and cleanup materials employed, in tons; and
- e. the 12-month rolling total VOC emissions from all coatings and cleanup materials employed, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1), and OAC rule 3745-31-05(A)(3)]

- (3) The permittee shall maintain records on any time that fuel other than natural gas is employed in the drying oven.

[Authority for term: OAC rule 3745-77-07(C)(1), and OAC rule 3745-31-05(A)(3)]

- (4) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the filter system with any modifications deemed necessary by the permittee during the time period in which the filter is utilized. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for term: OAC rule 3745-77-07(C)(1), and OAC rule 3745-17-11(C)]

- (5) The permittee shall conduct periodic inspections of the filter system 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. The periodic inspections of the filter system shall be performed at a frequency that is based upon the recommendation of the manufacturer, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, the permittee shall conduct a comprehensive inspection of the filter system, not less than once each calendar year, while the emissions unit is shut down; and shall perform any needed maintenance and repair for the control device to ensure that it is operated in accordance with the manufacturer's recommendations.

[Authority for term: OAC rule 3745-77-07(C)(1), and OAC rule 3745-17-11(C)]

- (6) The permittee shall document each inspection of the filter system by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the 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.

[Authority for term: OAC rule 3745-77-07(C)(1), and OAC rule 3745-17-11(C)]

- (7) In the event that the filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the filter system shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain a record of those periods when the filter system is not operating in accordance with such requirements. These records shall be maintained at the facility for not less than five years from the date of completion and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for term: OAC rule 3745-77-07(C)(1), and OAC rule 3745-17-11(C)]

- (8) The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application. The predicted 1-hour Maximum In-Stack concentration 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: Acetone

TLV (ppm): 500

Maximum Hourly Emission Rate (lbs/hr): 1.95

Predicted 1-Hour Maximum In-Stack Concentration (ppm): 0.651

MAGLC (ppm): 11.90

Pollutant: Butyl Acetate

TLV (ppm): 150

Maximum Hourly Emission Rate (lbs/hr): 1.66

Predicted 1-Hour Maximum In-Stack Concentration (ppm): 0.553

MAGLC (ppm): 3.57

Pollutant: Ethyl Benzene

TLV (ppm): 100

Maximum Hourly Emission Rate (lbs/hr): 0.06

Predicted 1-Hour Maximum In-Stack Concentration (ppm): 0.02

MAGLC (ppm): 2.38

Pollutant: Ethylene Glycol Monobutyl Ether Acetate

TLV (ppm): 5

Maximum Hourly Emission Rate (lbs/hr): 0.06

Predicted 1-Hour Maximum In-Stack Concentration (ppm): 0.02

MAGLC (ppm): 0.12

Pollutant: Xylene

TLV (ppm): 100

Maximum Hourly Emission Rate (lbs/hr): 1.11

Predicted 1-Hour Maximum In-Stack Concentration (ppm): 0.37

MAGLC (ppm): 2.38

Pollutant: Heptane



TLV (ppm): 400

Maximum Hourly Emission Rate (lbs/hr): 0.13

Predicted 1-Hour Maximum In-Stack Concentration (ppm): 0.04

MAGLC (ppm): 9.52

Pollutant: Methyl Isobutyl Ketone

TLV (ppm): 50

Maximum Hourly Emission Rate (lbs/hr): 0.15

Predicted 1-Hour Maximum In-Stack Concentration (ppm): 0.05

MAGLC (ppm): 1.19

Pollutant: Toluene

TLV (ppm): 50

Maximum Hourly Emission Rate (lbs/hr): 0.25

Predicted 1-Hour Maximum In-Stack Concentration (ppm): 0.08

MAGLC (ppm): 1.19

Pollutant: VM&P Naphtha

TLV (ppm): 300

Maximum Hourly Emission Rate (lbs/hr): 0.70

Predicted 1-Hour Maximum In-Stack Concentration (ppm): 0.24

MAGLC (ppm): 7.14

Pollutant: Methyl Propyl Ketone

TLV (ppm): 200

Maximum Hourly Emission Rate (lbs/hr): 0.01

Predicted 1-Hour Maximum In-Stack Concentration (ppm): 0.18

MAGLC (ppm): 4.76

[Authority for term: OAC rule 3745-114-01]

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

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

[Authority for term: OAC rule 3745-114-01]

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

[Authority for term: OAC rule 3745-114-01]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation reports that identify the following:
 - a. all exceedances of the rolling, 12-month period coating usage limitation of 8,760 gallons excluding water and exempt solvents;
 - b. all exceedances of coating VOC content of 3.5 lbs/gal;
 - c. all exceedances of the rolling, 12-month period cleaning solvent usage limitation of 1,000 gallons;
 - d. all exceedances of liquid clean up VOC content of 3.04 lbs/gal; and/or
 - e. all exceedances of the rolling, 12-month period VOC emission limitation of 16.85 tons.

These quarterly deviation reports are due by the dates specified in the standard terms and conditions of this permit.

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C) and OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Southwest District Office, Division of Air Pollution Control) within 30 days following the end of the calendar month.

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C) and OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C) and OAC rule 3745-77-07(C)(1)]

- (4) The permittee shall include in the quarterly report any record of the date and length of time the filter system was not in service during coating application. The quarterly report shall be submitted by January 31st, April 30th, July 31st, and October 31st of each year to the Ohio EPA Southwest District Office, Division of Air Pollution Control.

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C) and OAC rule 3745-77-07(C)(1)]



f) Testing Requirements

(1) Compliance with the emission limitation in Section b)(1) of these terms and conditions shall be determined in accordance with the following method:

a. Emission Limitation:

16.85 tons of VOC per rolling, 12-month period

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements of Section d), of this permit.

Formulation data or Method 24 of 40 CFR, Part 60, Appendix A, shall be used to determine the organic compound contents of the materials employed.

[Authority for term: OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

The VOC content of the coating materials employed in this emissions unit shall not exceed 3.5 lbs/gallon, as applied.

The VOC content of liquid organic cleanup materials employed in this emissions unit shall not exceed 3.04 lbs/gallon, as applied.

Applicable Compliance Method:

Formulation data or Method 24 of 40 CFR, Part 60, Appendix A, shall be used to demonstrate compliance with the organic compound content limitations.

[Authority for term: OAC rule 3745-77-07(C)(1)]

c. Emissions Limitation:

0.020 pound per million Btu of actual heat input

Applicable Compliance Method:

Compliance shall be based on the use of natural gas and the record keeping in section d) of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

d. Emission Limitation:

Visible Particulate Emissions (PE) shall not exceed 20% as a six-minute average, except as provided by rule.



Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None



4. K006, Paint Spray Booth - Building 103

Operations, Property and/or Equipment Description:

Paint Spray Booth for window parts in Building 103

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) b)(1)g., d)(8), (9), and (10), see below.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC paragraph 3745-31-05(A)(3), as effective 11/30/01	VOC content shall not exceed 3.04 lbs/gallon of liquid organic cleanup materials. Compliance with OAC rule 3745-31-05(A)(3) also includes compliance with the requirements of OAC rule 3745-31-05(D), 3745-21-09(U), and 3745-17-07(A). See Sections, b)(2)a
b.	OAC paragraph 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See Section b)(2)b., below.
c.	OAC rule 3745-31-05(D) (to avoid PSD and minimize overall facility VOC emissions)	Total combined VOC from the coating and cleanup operations shall not exceed 6.77 tons per rolling, 12-month period for emissions unit K006.
d.	OAC rule 3745-21-09(U)	VOC content shall not exceed 3.5 pounds per gallon of coating, excluding water and exempt solvent.



Table with 3 rows and 3 columns. Row 1: e., OAC rule 3745-17-07(A), Visible Particulate Emissions (PE) shall not exceed 20% as a six-minute average, except as provided by rule. Row 2: f., OAC rule 3745-17-11(C), Use of an overspray control system. Row 3: g., OAC rule 3745-114-01, Ohio Toxic Rule. See sections d)(7), d)(8) and d)(9), below.

(2) Additional Terms and Conditions

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

[[Authority for term: OAC rule 3745-77-07(A)(1)]]

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

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this emissions unit since the potential emissions are less than ten tons per year.

[[Authority for term: OAC rule 3745-77-07(A)(1)]]

c. The particulate matter emission limit is derived based on the equation noted with Table 1 from OAC Rule 3745-11. Figure II does not apply (per OAC rule 3745-17-11(A)(2)(a)(i)) because the uncontrolled mass rate of particulate emissions cannot be determined.

[Authority for term: OAC rule 3745-17-11(A)(2)(a)(i)]

d. The permittee shall operate the filter system for the coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual, with any modifications deemed necessary by the permittee. The filter system shall be employed during all periods of coating application to control particulate emissions.

[Authority for term: OAC rule 3745-17-07(C)]



c) Operational Restrictions

- (1) The maximum annual coating usage shall not exceed 3,000 gallons per rolling, 12-month period excluding water and exempt solvents for emissions unit K006.

[Authority for term: OAC rule 3745-77-07(A)(1), and OAC rule 3745-31-05(A)(3)]

- (2) The maximum annual cleaning solvent usage shall not exceed 1,000 gallons per rolling, 12-month period for emissions unit K006.

[Authority for term: OAC rule 3745-77-07(A)(1), and OAC rule 3745-31-05(A)(3)]

- (3) This emission unit shall be equipped with a filter system that shall minimize or eliminate all particulate emissions from the painting operation.

[Authority for term: OAC rule 3745-77-07(A)(1), and OAC rule 3745-17-11(C)]

d) Monitoring and/or Recordkeeping Requirements

- (1) This facility shall maintain the following monthly records on all coatings employed in emissions unit K006:

- a. the name of the coating employed;
- b. the volatile organic compound content, in lbs/gallon excluding water and exempt solvents;
- c. the amount of coating employed, in gallons;
- d. the 12-month rolling total amount of coatings employed, in gallons per last 12-month period;
- e. the VOC emission of all coatings employed, in tons per month; and
- f. the 12-month rolling total amount of VOC emitted from the use of coatings, in tons per last 12-month period.

[Authority for term: OAC rule 3745-77-07(C)(1), and OAC rule 3745-31-05(A)(3)]

- (2) This facility shall maintain the following monthly records on all cleanup material employed in emissions unit K006:

- a. the name of the material employed;
- b. the volatile organic compound content, in lbs/gallon;
- c. the amount of material employed, in gallons;
- d. the 12-month rolling total amount of cleanup materials employed, in gallons per last 12-month period;
- e. the VOC emission of all cleanup materials, in tons per month; and

- f. the 12-month rolling total amount of VOC emitted from the use of cleanup materials, in tons per last 12-month period.

[Authority for term: OAC rule 3745-77-07(C)(1), and OAC rule 3745-31-05(A)(3)]

- (3) This facility shall maintain the following monthly records on all coating and cleanup material employed in emissions unit K006:
 - a. the combined monthly VOC emissions for coating and cleanup materials employed, in tons per month; and
 - b. the combined 12-month rolling total amount of VOC emitted from the use of coating and cleanup materials, in tons per last 12-month period.

[Authority for term: OAC rule 3745-77-07(C)(1), and OAC rule 3745-31-05(A)(3)]

- (4) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the filter system with any modifications deemed necessary by the permittee during the time period in which the filter is utilized. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for term: OAC rule 3745-77-07(C)(1), and OAC rule 3745-17-11(C)]

- (5) The permittee shall conduct periodic inspections of the filter system 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. The periodic inspections of the filter system shall be performed at a frequency that is based upon the recommendation of the manufacturer, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, the permittee shall conduct a comprehensive inspection of the filter system, not less than once each calendar year, while the emissions unit is shut down; and shall perform any needed maintenance and repair for the control device to ensure that it is operated in accordance with the manufacturer's recommendations.

[Authority for term: OAC rule 3745-77-07(C)(1), and OAC rule 3745-17-11(C)]

- (6) The permittee shall document each inspection of the filter system by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the 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.

[Authority for term: OAC rule 3745-77-07(C)(1), and OAC rule 3745-17-11(C)]

- (7) In the event that the filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the filter system shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain a record of those periods when the filter system is not operating in accordance with such requirements. These records shall be maintained at the facility for not less than five years from the date of completion and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for term: OAC rule 3745-77-07(C)(1), and OAC rule 3745-17-11(C)]

- (8) The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application. The predicted 1-hour Maximum In-Stack concentration 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: Butyl Acetate

TLV (ppm): 200

Maximum Hourly Emission Rate (g/s): 0.4817

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 424.9

MAGLC (ug/m3): 22,623.4

Pollutant: Toluene

TLV (ppm): 50

Maximum Hourly Emission Rate (g/s): 0.0832

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 73.39

MAGLC (ug/m3): 4,485.8

Pollutant: Xylene

TLV (ppm): 100

Maximum Hourly Emission Rate (g/s): 0.0671

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 54.51

MAGLC (ug/m3): 10,337.9

[Authority for term: OAC rule 3745-114-01]

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

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

[Authority for term: OAC rule 3745-114-01]

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

[Authority for term: OAC rule 3745-114-01]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation reports that identify the following:
- a. all exceedances of the rolling, 12-month period coating usage limitation of 3,000 gallons excluding water and exempt solvents;
 - b. all exceedances of coating VOC content of 3.5 lbs/gal;
 - c. all exceedances of the rolling, 12-month period cleaning solvent usage limitation of 1,000 gallons;
 - d. all exceedances of liquid clean up VOC content of 3.04 lbs/gal; and/or
 - e. all exceedances of the rolling, 12-month period VOC emission limitation of 6.77 tons for emissions unit K006.

These quarterly deviation reports are due by the dates specified in the standard terms and conditions of this permit.

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C) and OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Southwest District Office, Division of Air Pollution Control) within 30 days following the end of the calendar month.

The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C) and OAC rule 3745-77-07(C)(1)]

- (3) The permittee shall include in the quarterly report any record of the date and length of time the filter system was not in service during coating application. The quarterly report shall be submitted by January 31st, April 30th, July 31st, and October 31st of each year to the Ohio EPA Southwest District Office, Division of Air Pollution Control.

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C) and OAC rule 3745-77-07(C)(1)]



f) Testing Requirements

(1) Compliance with the emission limitation in Section b)(1) of these terms and conditions shall be determined in accordance with the following method:

a. Emission Limitation:

6.77 tons of VOC per rolling, 12-month period for emissions unit K006.

Applicable Compliance Method:

Compliance shall be based on the record keeping as established in section d) of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

The VOC content of the coating materials employed in this emissions unit shall not exceed 3.5 lbs/gallon, as applied.

The VOC content of liquid organic cleanup materials employed in this emissions unit shall not exceed 3.04 lbs/gallon, as applied.

Applicable Compliance Method:

Formulation data or Method 24 of 40 CFR, Part 60, Appendix A, shall be used to demonstrate compliance with the organic compound content limitations.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements.

(1) None



5. P002, Wood Shop/Bldg.102

Operations, Property and/or Equipment Description:

Woodworking operations (sanders, saws, planers), Bldg. 102

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

Table with 2 columns: Applicable Rules/Requirements, Applicable Emissions Limitations/Control Measures. Row a: OAC rule 3745-17-11(B)(2), 2.40 lbs of particulate emissions (PE)/hour. Row b: OAC rule 3745-17-07(A), Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the cyclone associated with this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;



- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to eliminate the visible emissions.

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the cyclone associated with this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA, Southwest District Office, Division of Air Pollution Control) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

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

a. Emission Limitation-

2.40 lbs PE/hr

Applicable Compliance Method:

To determine the actual worst case emissions rate for PE, the following equation (from AP-42, Table 10.3-1) may be used:

$$E = MPWR \times EF$$

E = the maximum PE rate (lbs/hr)

MPWR = the maximum square footage of the material cut, sanded, shaped, etc.

EF = emission factor (0.1lb PE/sq.ft. of material)

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation in accordance with OAC rule 3745-17-03(B)(10).

[Authority for term: OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.



Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

- (1) None.



6. P004, Paint Stripping Area in Bldg. #103

Operations, Property and/or Equipment Description:

Stripping of paint from trailers, Bldg. 103

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) b)(1)d., d)(3), d)(4), and d)(5).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3):	The OC content of the paint stripping materials employed in this emissions unit shall not exceed 10.0 lbs/gallon, as applied. The OC content of liquid organic cleanup materials employed in this emissions unit shall not exceed 6.57 lbs/gallon, as applied. The requirements of this rule also include compliance with the requirements in and 3745-31-05(D).
b.	OAC rule 3745-31-05(D) Synthetic minor to avoid PSD	Total combined OC from the stripping and cleanup operations shall not exceed 6.23 tons per rolling, 12-month period for emissions unit P004
c.	OAC rule 3745-114-01	Ohio Toxic Rule See sections d)(3), d)(4) and d)(5), below.

(2) Additional Terms and Conditions

a. None.



c) Operational Restrictions

- (1) The maximum annual cleaning solvent usage shall not exceed 1,000 gallons per rolling, 12-month period for emissions unit P004.

[Authority for term: OAC rule 3745-77-07(A)(1), and OAC rule 3745-31-05(A)(3)]

- (2) The maximum annual brushable stripper usage shall not exceed 400 gallons per rolling, 12-month period for emissions unit P004.

[Authority for term: OAC rule 3745-77-07(A)(1), and OAC rule 3745-31-05(A)(3)]

- (3) The maximum annual aircraft paint remover usage shall not exceed 200 gallons per rolling, 12-month period for emissions unit P004.

[Authority for term: OAC rule 3745-77-07(A)(1), and OAC rule 3745-31-05(A)(3)]

d) Monitoring and/or Recordkeeping Requirements

- (1) This facility shall maintain the following monthly records on all strippers employed in emissions unit P004:

- a. the name of the coating employed;
- b. the amount of coating employed, in gallons;
- c. the organic compound content, in lbs/gallon;
- d. the OC emission of all coatings employed, in tons per month; and
- e. the 12-month rolling total amount of OC emitted from the use of coatings, in tons per last 12-month period.

[Authority for term: OAC rule 3745-77-07(A)(1), and OAC rule 3745-31-05(A)(3)]

- (2) The permittee shall collect and record the following information each month on the cleanup materials in emissions unit P004:

- a. the name of the material employed;
- b. the amount of material employed, in gallons;
- c. the organic compound content, in lbs/gallon;
- d. the OC emission of all cleanup materials, in tons per month; and
- e. the 12-month rolling total amount of OC emitted from the use of cleanup materials, in tons per last 12-month period.

[Authority for term: OAC rule 3745-77-07(A)(1), and OAC rule 3745-31-05(A)(3)]

- (3) The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results for the "worst case" pollutant(s):

Pollutant: Methylene Chloride

TLV (ppm): 50

Maximum Hourly Emission Rate (g/s): 0.323

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 140.3

MAGLC (ug/m3): 4135.2

[Authority for term: OAC rule 3745-114-01]

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(PPP)(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 (PPP)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

[Authority for term: OAC rule 3745-114-01]

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

[Authority for term: OAC rule 3745-114-01]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation reports that identify the following:
- a. all exceedances of the rolling, 12-month period cleaning solvent usage limitation of 1,000 gallons;
 - b. all exceedances of liquid cleanup OC content of 6.57 lbs/gal;
 - c. all exceedances of the rolling, 12-month period brushable stripper usage limitation of 400 gallons;
 - d. all exceedances of the rolling, 12-month period aircraft paint remover usage limitation of 200 gallons;
 - e. all exceedances of paint stripper OC content of 10 lbs/gal; and/or
 - f. all exceedances of the rolling, 12-month period OC emission limitation of 6.23 tons for emissions unit P004.

These quarterly deviation reports are due by the dates specified in the General Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C) and OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall notify the Director, in writing, of any monthly record showing the use of noncompliant materials, i.e., photo chemically reactive materials. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Southwest District



Office, Division of Air Pollution Control within 30 days following the end of the calendar month during which the noncompliance occurred.

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C) and OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

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

a. Emission Limitation:

6.23 tons of OC per rolling, 12-month period for emissions unit P004.

Applicable Compliance Method:

Compliance shall be based on the record keeping as established in section d) of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

The OC content of the paint stripping materials employed in this emissions unit shall not exceed 10.0 lbs/gallon, as applied.

The OC content of liquid organic cleanup materials employed in this emissions unit shall not exceed 6.57 lbs/gallon, as applied.

Applicable Compliance Method:

Formulation data or Method 24 of 40 CFR, Part 60, Appendix A, shall be used to demonstrate compliance with the organic compound content limitations.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None



7. P005, Aluminum CNC Router

Operations, Property and/or Equipment Description:

Aluminum CNC router and associated high efficiency cyclone

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations, 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 set forth below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC paragraph 3745-31-05(A)(3), as effective 11/30/01	The use of an add-on air pollution control device. Compliance with OAC rule 3745-31-05(A)(3) also includes compliance with the requirements of OAC rule 3745-17-11(B), and 3745-17-07(A). See Sections, b)(2)a., c)(1), c)(2), d)(1), d)(2), e)(1), e)(2), and f)(1)b., below
b.	OAC paragraph 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See Section b)(2)b., below.
c.	OAC rule 3745-17-11(B)(1) Table I (Process production emissions)	The particulate emissions (PE) from this emissions unit shall not exceed 1.3 pounds per hour.
d.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule. See Section, f)(1)c., below.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05

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

[Authority for term: OAC rule 3745-77-07(A)(1)]

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

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions (PE) and PM₁₀ emissions from this emissions unit since the potential emissions are less than ten tons per year.

[Authority for term: OAC rule 3745-77-07(A)(1)]

c) Operational Restrictions

- (1) This emissions unit shall be equipped with a cyclone collector that minimizes and/or eliminate the release of particulate emissions (PE).

[Authority for term: OAC rule 3745-77-07(A)(1), and OAC rule 3745-31-05(A)(3)]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records that document any time periods when the cyclone was not in service when this emissions unit was in operation, as well as, a record of all operations during which the cyclone 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.

[Authority for term: OAC rule 3745-77-07(c)(1), and OAC rule 3745-31-05(A)(3)]

- (2) The permittee shall maintain records that document any time periods that this emissions unit was not maintained in accordance the manufacturers recommendation maintenance procedures and/or operational specifications.

[Authority for term: OAC rule 3745-77-07(C)(1), and OAC rule 3745-31-05(A)(3)]

- (3) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the cyclone associated with this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the location and color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to eliminate the visible emissions.

[Authority for term: OAC rule 3745-77-07(C)(1), and OAC rule 3745-31-05(A)(3)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following information concerning the operation of the cyclone during the operation of the emissions unit(s):

- a. The permittee shall submit quarterly deviation (excursion) reports that identify all instances when the cyclone was not in service when this emissions unit was in operation.

If no deviations/excursions occurred during a calendar quarter, the report shall so state that no deviations occurred during the reporting period.

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

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

- (2) The permittee shall submit quarterly written reports that:

- a. identify all days during which any visible PE were observed from the add-on control device serving this emissions unit; and
- b. describe the corrective actions taken to eliminate the visible PE.

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

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



f) Testing Requirements

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

a. Emission Limitation:

1.3 pound per hour

The above limitation is based on the following equation:

$$(E) = 4.10 \times (P)^{0.67}$$

Where:

(E) = Allowable Rate of Particulate Emissions, in pounds per hour; and

(P) = Process Weight Rate at Maximum Capacity, in tons per hour, ((330 lbs/hr / 2000 = 0.17 tons per hour)).

Applicable Compliance Method:

Compliance based on the maximum production rate is 330 pounds per hour. Any changes in this emissions unit and/or the above equations that would cause an increase in the potential hourly emissions from this emissions unit will need to be reviewed by the appropriate office for possible additional air pollution permit requirements.

[Authority for term: OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

0.25 tons of PE/PM₁₀ per year

The above limitation is based on the following equation:

$$AER = \{[(Hp/2000) \times Ef] \times (1-Cf)\} \times 8760/2000$$

Where:

AER = Annual emission rate, in tons of PE/PM₁₀ per year;

Hp = Hourly production rate, in pounds per hour, (330, from PTI EAC form);

Ef = Emission factor, in pounds of PE/PM₁₀ per ton of material cut, 17, (Cutting emission factor SCC 3-04-003-40, Fire); and

Cf = Control efficiency of add-on control device, 98%, (PTI application calculation sheet).



Applicable Compliance Method:

Compliance based on the maximum production rate is 330 pounds per hour. Any changes in this emissions unit and/or the above equations that would cause an increase in the potential hourly emissions from this emissions unit will need to be reviewed by the appropriate office for possible additional air pollution permit requirements.

[Authority for term: OAC rule 3745-77-07(C)(1)]

c. Emission Limitation

Visible particulate emissions from any/the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If requested, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

[OAC rule 3745-17-03(B)(1)(a)]

g) Miscellaneous Requirements

(1) None.



8. R001, Glue & Staining Spray Booth - Building 102

Operations, Property and/or Equipment Description:

Glue Spray Booth - Spray-on Contact Adhesive - Building 102

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(B)	PE shall not exceed 0.551 lb PE/hr
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-11(C)	Use of a overspray control system.

(2) Additional Terms and Conditions

a. The particulate matter emission limit is derived based on the equation noted with Table 1 from OAC Rule 3745-11. Figure II does not apply (per OAC rule 3745-17-11(A)(2)(a)(i)) because the uncontrolled mass rate of particulate emissions cannot be determined.

[Authority for term: OAC rule 3745-17-11(A)(2)(a)(i)]

b. The permittee shall operate the filter system for the coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual, with any modifications deemed necessary by the permittee. The filter system shall be employed during all periods of coating application to control particulate emissions.

[Authority for term: OAC rule 3745-17-07(C)]

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

[Authority for term: OAC rule 3745-17-07(C)]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

[Authority for term: OAC rule 3745-17-07(C)]

- (2) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the filter system with any modifications deemed necessary by the permittee during the time period in which the filter is utilized. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for term: OAC rule 3745-17-07(C)]

- (3) The permittee shall conduct periodic inspections of the filter system 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. The periodic inspections of the filter system shall be performed at a frequency that is based upon the recommendation of the manufacturer, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, the permittee shall conduct a comprehensive inspection of the filter system, not less than once each calendar year, while the emissions unit is shut down; and shall perform any needed maintenance and repair for the control device to ensure that it is operated in accordance with the manufacturer's recommendations.

[Authority for term: OAC rule 3745-17-07(C)]

- (4) The permittee shall document each inspection of the filter system by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the 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.

[Authority for term: OAC rule 3745-17-07(C)]

- (5) In the event that the filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the filter system shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain a record of those periods when the filter system is not operating in accordance



with such requirements. These records shall be maintained at the facility for not less than five years from the date of completion and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[Authority for term: OAC rule 3745-17-07(C)]

e) Reporting Requirements

- (1) The permittee shall notify the Director (the Ohio EPA, Southwest District Office, Division of Air Pollution Control) in writing of any daily record showing that 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 Ohio EPA, Southwest District Office, Division of Air Pollution Control) within 30 days after the event occurs.

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C) and OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall include in the quarterly report any record of the date and length of time the filter system was not in service during coating application. The quarterly report shall be submitted in accordance with the General Terms and Conditions of this permit to the Ohio EPA, Southwest District Office, Division of Air Pollution Control.

[Authority for term: OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C) and OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

- (1) Compliance with the emission limitation in section b).1. of these terms and conditions shall be determined in accordance with the following method:

a. Emission Limitation:

0.551 lb PE/hr

Applicable Compliance Method:

To determine the actual worst case emissions rate for PE, the following equation may be used:

$$E = \text{MCSUR} \times (1 - \text{TE}) \times (1 - \text{CE})$$

where:

E = PE rate (lbs/hr)

MCSUR = the maximum coating solids usage 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, the permittee shall demonstrate compliance with the hourly allowable PE limitation in accordance with OAC rule 3745-17-03(B)(10).

[Authority for term: OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

None.