

Synthetic Minor Determination and/or Netting Determination

Permit To Install 03-16030

A. Source Description

This permit is for all emission units located at Hedstrom Corporation. Emission units include, three spray booths, one maintenance decorator, nine printers, and four lacquer lines.

B. Facility Emissions and Attainment Status

The facility has requested a synthetic minor to avoid Prevention of Significant Deterioration (PSD) thresholds for volatile organic compounds (VOC). Federally enforceable short-term limitations and hours of operation restrictions for coating operations will be employed to limit the potential to emit. For purposes of federal enforceability a limitation on OCs effectively restricts VOCs. The potential to emit will be restricted to a level which will keep the facility under the "major" source threshold of 250 tons VOC per year.

Hedstrom Corporation is located in Ashland County which is in attainment for all pollutants.

C. Source Emissions

Federally enforceable short-term limitations and hours of operation restrictions for coating operations will result in potential VOCs of 211.14 tons per year.

D. Conclusion

With the hourly operating restrictions and short-term limitations, the potential to emit at the facility will be below the PSD "major" source threshold of 250 tons VOC.



State of Ohio Environmental Protection Agency

RE: DRAFT PERMIT TO INSTALL CERTIFIED MAIL
ASHLAND COUNTY

Street Address:

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

Mailing Address:

Lazarus Gov.
Center

Application No: 03-16030

DATE: 4/20/2004

Hedstrom Corporation
Kathy Ramsey
710 Orange Street
Ashland, OH 44805

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$3400** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

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

CC: USEPA

NWDO

**ASHLAND
COUNTY**

**PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL 03-16030 FOR AN AIR CONTAMINANT SOURCE FOR
HEDSTROM CORPORATION**

On 4/20/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Hedstrom Corporation**, located at **710 Orange Street, Ashland, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 03-16030:

(4) spray booths, (4) lacquer lines and (9) printers.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Don Waltermeyer, Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402
[(419)352-8461]



**Permit To Install
Terms and
Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 03-16030

Application Number: 03-16030
APS Premise Number: 0303010045
Permit Fee: **To be entered upon final issuance**
Name of Facility: Hedstrom Corporation
Person to Contact: Kathy Ramsey
Address: 710 Orange Street
Ashland, OH 44805

Location of proposed air contaminant source(s) [emissions unit(s)]:
**710 Orange Street
Ashland, Ohio**

Description of proposed emissions unit(s):
(4) spray booths, (4) lacquer lines and (9) printers.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Hedstrom Corporation

Facility ID: 0303010045

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Part I - GENERAL TERMS AND CONDITIONS

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

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

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- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

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

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

3. Risk Management Plans

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

4. Title IV Provisions

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

5. Severability Clause

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

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6. General Requirements

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

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. Federal and State Enforceability

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

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally

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applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

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

10. Permit To Operate Application

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

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3745-77-08(C)(3)(d).

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

11. Best Available Technology

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

12. Air Pollution Nuisance

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

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

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Permit Transfers

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.

4. Termination of Permit To Install

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

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5. Construction of New Sources(s)

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

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

6. Public Disclosure

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

7. Applicability

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

8. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the

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facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

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

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

C. Permit To Install Summary of Allowable Emissions

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

SUMMARY (for informational purposes only)

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
Organic Compounds (OC)	211.14
Non-PRM OC from Cleanup	66.50

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Facility ID: 0303010045

Emissions Unit ID: R006

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

The emission units within this permit are subject to 40 CFR Part 63, Subpart PPPP, National Emission Standards for Hazardous Air Pollutants (NESHAP): for Surface Coating of Plastic Parts and Products. The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart PPPP. The permittee shall also comply with all applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Table 2 of 40 CFR Part 63, Subpart PPPP. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart PPPP and Subpart A.

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

None

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PTI A

Emissions Unit ID: R006

Issued: To be entered upon final issuance

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R006 - Hand Splatter Spray Booth, with dry filtration (Modification of existing emissions unit to establish synthetic minor limitations)	OAC rule 3745-31-05(A)(3)	Emissions of organic compounds (OC) shall not exceed 8 pounds/hour and 40 pounds/day from coating operations.
		7.30 tons organic compounds (OC)/yr from coating operations
		27.5 lbs organic compounds (OC)/month, 0.17 tons OC/yr from cleanup operations (see Sections A.I.2.e, A.II.1, and A.II.2).
	OAC rule 3745-31-05(C)	See Section A.I.2.d.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3), see Section A.2.c.
	OAC rule 3745-17-11(A)	See Section A.I.2.a.
	OAC rule 3745-17-07(A)	See Section A.I.2.b.
	40 CFR Part 63, Subpart PPPP	See Section A of Part II - FACILITY SPECIFIC TERMS AND CONDITIONS.

Emissions Unit ID: R006

2. Additional Terms and Conditions

- 2.a** The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), this emissions unit is exempt from the requirements of OAC rule 3745-17-11(B)(2).
- 2.b** This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because OAC rule 3745-17-11 is not applicable.
- 2.c** The requirements of OAC rule 3745-31-05(A)(3) that emissions of organic compounds (OC) shall not exceed 8 pounds/hour and 40 pounds/day applies on all days even when only non-photochemically reactive materials are used. Photochemically reactive materials is defined in OAC rule 3745-21-01(C)(5).
- 2.d** This permit establishes federally enforceable limitations on emissions of organic compounds (OC) for the purpose of limiting the potential to emit to avoid applicability of the Prevention of Significant Deterioration (PSD) rules. This limitation shall be established through OAC rule 3745-31-05(A)(3), by limiting each emissions unit to no more than 40 pounds of OCs per day. For purposes of federal enforceability a limitation on OCs effectively restricts VOCs.
- 2.e** The emission limitation for cleanup operations involves organic compounds which do not participate in atmospheric photochemical reactions (see Section A.II.2) and therefore, are not considered volatile organic compounds as defined in OAC rule 3745-21-01 and 40 CFR 51.100(s).

II. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), for cleanup operations in this emissions unit is prohibited.
2. The use of volatile organic compounds, as defined in OAC rule 3745-21-01(B)(6) and 40 CFR 51.100(s), for cleanup operations in this emissions unit is prohibited.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for coating usage in emissions unit R006:
 - a. the company identification for each coating employed;
 - b. the number of gallons of each coating employed (gallons/day);
 - c. the organic compound content for each coating employed, in pounds per gallon;

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- d. the organic compound emissions from each coating employed, in lbs/day ("b" times "c");
 - e. the total organic compound emissions from all coating materials employed, in lbs/day (sum of "d" for all coatings);
 - f. the total number of hours the emissions unit was in operation; and
 - g. the OC emission rate, as an hourly average, in pounds ("e" divided by "f").
2. The permittee shall collect and record the following information each month for cleanup material usage in emissions unit R006:
- a. the company identification of each cleanup material employed;
 - b. documentation of whether or not each cleanup material employed is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5);
 - c. documentation of whether or not each cleanup material employed is a volatile organic compound as defined in OAC rule 3745-21-01(B)(6) and 40 CFR 51.100(s);
 - d. the number of gallons of each cleanup material employed (gallons/month);
 - e. the organic compound content for each cleanup material employed , in pounds per gallon;
 - f. the organic compound emissions from each cleanup material employed, in lbs/month ("d" times "e"); and
 - g. the total organic compound emissions from all cleanup materials employed, in lbs/month (sum of "f" for all cleanup materials).
3. At the end of each year the permittee shall collect and record the following information for annual emissions reporting and demonstration of compliance with the ton per year limits:
- a. the annual organic compound emissions from all coatings employed and recorded in Section A.III.1 above, the sum of each calendar day from January 1 to December 31; and
 - b. the annual organic compound emissions from all cleanup materials employed and recorded in Section A.III.2 above, the sum of each calendar month from January through December.

IV. Reporting Requirements

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Emissions Unit ID: R006

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which include the following information:
 - a. an identification of each day during which the average hourly organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. an identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

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2. The permittee shall notify the Director (the Ohio EPA Northwest District Office) in writing of any monthly record showing the use of a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), for cleanup operations. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northwest District Office) within 30 days following the end of the calendar month.
3. The permittee shall notify the Director (the Ohio EPA Northwest District Office) in writing of any monthly record showing the use of a volatile organic compound, as defined in OAC rule 3745-21-01(B)(6) and/or 40 CFR 51.100(s), for cleanup operations. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northwest District Office) within 30 days following the end of the calendar month.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I.1 of these terms and conditions shall be determined in accordance with the following method(s):
 - a. **Emission Limitation**
8 pounds/hour of OC emissions from coating operations

Applicable Compliance Method
Compliance with hourly organic compound emission limit shall be based upon the record keeping requirements contained in Section A.III.1 of this permit.
 - b. **Emission Limitation**
40 pounds/day of OC emissions from coating operations

Applicable Compliance Method
Compliance with daily organic compound emission limit shall be based upon the record keeping requirements contained in Section A.III.1 of this permit.
 - c. **Emission Limitation**
7.30 tons/year of OC emissions from coating operations

Applicable Compliance Method
Compliance shall be determined based upon the recordkeeping requirements specified in Section A.III.1.
 - d. **Emission Limitation**
27.5 lbs OC/month from cleanup operations

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Applicable Compliance Method

Compliance shall be determined based upon the recordkeeping requirements specified in Section A.III.2.

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Emission Limitation

0.17 tons OC/yr from cleanup operations

Applicable Compliance Method

Compliance shall be determined based upon the recordkeeping requirements specified in Section A.III.2.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

VI. Miscellaneous Requirements

None

Hedst

PTI A

Emissions Unit ID: R006

Issued: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R006 - Hand Splatter Spray Booth, with dry filtration (Modification of existing emissions unit to establish synthetic minor limitations)	None	None

2. Additional Terms and Conditions

- 2.a Upon the permittee's demonstration of compliance with the final National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products, 40 CFR 63 Subpart PPPP, the following Air Toxic Policy shall no longer apply.

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

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Emissions Unit ID: R006

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Emissions Unit ID: R006

Issued: To be entered upon final issuance**VI. Miscellaneous Requirements**

Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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Emissions Unit ID: R007

Issued: To be entered upon final issuance

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, - and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R007 - Semi-Automatic Spray Booth Decorator #1, with dry filtration (Modification of existing emissions unit to establish synthetic minor limitations)	OAC rule 3745-31-05(A)(3)	Emissions of organic compounds (OC) shall not exceed 8 pounds/hour and 40 pounds/day from coating operations.
	OAC rule 3745-31-05(C)	7.30 tons organic compounds (OC)/yr from coating operations
	OAC rule 3745-21-07(G)(2)	27.5 lbs organic compounds (OC)/month, 0.17 tons OC/yr from cleanup operations (see Sections A.I.2.e, A.II.1, and A.II.2).
	OAC rule 3745-31-05(C)	See Section A.I.2.d.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3), see Section A.2.c.
	OAC rule 3745-17-11(A)	See Section A.I.2.a.
	OAC rule 3745-17-07(A)	See Section A.I.2.b.
	40 CFR Part 63, Subpart PPPP	See Section A of Part II - FACILITY SPECIFIC TERMS AND CONDITIONS.

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

- 2.a** The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), this emissions unit is exempt from the requirements of OAC rule 3745-17-11(B)(2).
- 2.b** This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because OAC rule 3745-17-11 is not applicable.
- 2.c** The requirements of OAC rule 3745-31-05(A)(3) that emissions of organic compounds (OC) shall not exceed 8 pounds/hour and 40 pounds/day applies on all days even when only non-photochemically reactive materials are used. Photochemically reactive materials is defined in OAC rule 3745-21-01(C)(5).
- 2.d** This permit establishes federally enforceable limitations on emissions of organic compounds (OC) for the purpose of limiting the potential to emit to avoid applicability of the Prevention of Significant Deterioration (PSD) rules. This limitation shall be established through OAC rule 3745-31-05(A)(3), by limiting each emissions unit to no more than 40 pounds of OCs per day. For purposes of federal enforceability a limitation on OCs effectively restricts VOCs.
- 2.e** The emission limitation for cleanup operations involves organic compounds which do not participate in atmospheric photochemical reactions (see Section A.II.2) and therefore, are not considered volatile organic compounds as defined in OAC rule 3745-21-01 and 40 CFR 51.100(s).

II. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), for cleanup operations in this emissions unit is prohibited.
2. The use of volatile organic compounds, as defined in OAC rule 3745-21-01(B)(6) and 40 CFR 51.100(s), for cleanup operations in this emissions unit is prohibited.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for coating usage in emissions unit R007:
 - a. the company identification for each coating employed;

- b. the number of gallons of each coating employed (gallons/day);
 - c. the organic compound content for each coating employed, in pounds per gallon;
 - d. the organic compound emissions from each coating employed, in lbs/day ("b" times "c");
 - e. the total organic compound emissions from all coating materials employed, in lbs/day (sum of "d" for all coatings);
 - f. the total number of hours the emissions unit was in operation; and
 - g. the OC emission rate, as an hourly average, in pounds ("e" divided by "f").
2. The permittee shall collect and record the following information each month for cleanup material usage in emissions unit R007:
- a. the company identification of each cleanup material employed;
 - b. documentation of whether or not each cleanup material employed is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5);
 - c. documentation of whether or not each cleanup material employed is a volatile organic compound as defined in OAC rule 3745-21-01(B)(6) and 40 CFR 51.100(s);
 - d. the number of gallons of each cleanup material employed (gallons/month);
 - e. the organic compound content for each cleanup material employed, in pounds per gallon;
 - f. the organic compound emissions from each cleanup material employed, in lbs/month ("d" times "e"); and
 - g. the total organic compound emissions from all cleanup materials employed, in lbs/month (sum of "f" for all cleanup materials).
3. At the end of each year the permittee shall collect and record the following information for annual emissions reporting and demonstration of compliance with the ton per year limits:
- a. the annual organic compound emissions from all coatings employed and recorded in Section A.III.1 above, the sum of each calendar day from January 1 to December 31; and
 - b. the annual organic compound emissions from all cleanup materials employed and recorded in Section A.III.2 above, the sum of each calendar month from January through December.

IV. Reporting Requirements

Issued: To be entered upon final issuance

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which include the following information:
 - a. an identification of each day during which the average hourly organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. an identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

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2. The permittee shall notify the Director (the Ohio EPA Northwest District Office) in writing of any monthly record showing the use of a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), for cleanup operations. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northwest District Office) within 30 days following the end of the calendar month.
3. The permittee shall notify the Director (the Ohio EPA Northwest District Office) in writing of any monthly record showing the use of a volatile organic compound, as defined in OAC rule 3745-21-01(B)(6) and/or 40 CFR 51.100(s), for cleanup operations. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northwest District Office) within 30 days following the end of the calendar month.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I.1 of these terms and conditions shall be determined in accordance with the following method(s):
 - a. **Emission Limitation**
8 pounds/hour of OC emissions from coating operations

Applicable Compliance Method
Compliance with hourly organic compound emission limit shall be based upon the record keeping requirements contained in Section A.III.1 of this permit.
 - b. **Emission Limitation**
40 pounds/day of OC emissions from coating operations

Applicable Compliance Method
Compliance with daily organic compound emission limit shall be based upon the record keeping requirements contained in Section A.III.1 of this permit.
 - c. **Emission Limitation**
7.30 tons/year of OC emissions from coating operations

Applicable Compliance Method
Compliance shall be determined based upon the recordkeeping requirements specified in Section A.III.1.
 - d. **Emission Limitation**
27.5 lbs OC/month from cleanup operations

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Applicable Compliance Method

Compliance shall be determined based upon the recordkeeping requirements specified in Section A.III.2.

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Emission Limitation

0.17 tons OC/yr from cleanup operations

Applicable Compliance Method

Compliance shall be determined based upon the recordkeeping requirements specified in Section A.III.2.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

VI. Miscellaneous Requirements

None

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Emissions Unit ID: R007

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B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Semi-Automatic Spray Booth Decorator #1, with dry filtration (Modification of existing emissions unit to establish synthetic minor limitations)	None	None

2. Additional Terms and Conditions

- 2.a Upon the permittee's demonstration of compliance with the final National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products, 40 CFR 63 Subpart PPPP, the following Air Toxic Policy shall no longer apply.

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

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None

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Issued: To be entered upon final issuance**VI. Miscellaneous Requirements**

Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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Emissions Unit ID: R008

Issued: To be entered upon final issuance**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, - and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R008 - Semi-Automatic Spray Booth Decorator #2, with dry filtration (Modification of existing emissions unit to establish synthetic minor limitations)	OAC rule 3745-31-05(A)(3)	Emissions of organic compounds (OC) shall not exceed 8 pounds/hour and 40 pounds/day from coating operations. 7.30 tons organic compounds (OC)/yr from coating operations 27.5 lbs organic compounds (OC)/month, 0.17 tons OC/yr from cleanup operations (see Sections A.I.2.e, A.II.1, and A.II.2).
	OAC rule 3745-31-05(C)	See Section A.I.2.d.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3), see Section A.2.c.
	OAC rule 3745-17-11(A)	See Section A.I.2.a.
	OAC rule 3745-17-07(A)	See Section A.I.2.b.
	40 CFR Part 63, Subpart PPPP	See Section A of Part II - FACILITY SPECIFIC TERMS AND CONDITIONS.

Emissions Unit ID: R008

2. Additional Terms and Conditions

- 2.a** The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), this emissions unit is exempt from the requirements of OAC rule 3745-17-11(B)(2).
- 2.b** This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because OAC rule 3745-17-11 is not applicable.
- 2.c** The requirements of OAC rule 3745-31-05(A)(3) that emissions of organic compounds (OC) shall not exceed 8 pounds/hour and 40 pounds/day applies on all days even when only non-photochemically reactive materials are used. Photochemically reactive materials is defined in OAC rule 3745-21-01(C)(5).
- 2.d** This permit establishes federally enforceable limitations on emissions of organic compounds (OC) for the purpose of limiting the potential to emit to avoid applicability of the Prevention of Significant Deterioration (PSD) rules. This limitation shall be established through OAC rule 3745-31-05(A)(3), by limiting each emissions unit to no more than 40 pounds of OCs per day. For purposes of federal enforceability a limitation on OCs effectively restricts VOCs.
- 2.e** The emission limitation for cleanup operations involves organic compounds which do not participate in atmospheric photochemical reactions (see Section A.II.2) and therefore, are not considered volatile organic compounds as defined in OAC rule 3745-21-01 and 40 CFR 51.100(s).

II. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), for cleanup operations in this emissions unit is prohibited.
2. The use of volatile organic compounds, as defined in OAC rule 3745-21-01(B)(6) and 40 CFR 51.100(s), for cleanup operations in this emissions unit is prohibited.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for coating usage in emissions unit R008:
 - a. the company identification for each coating employed;
 - b. the number of gallons of each coating employed (gallons/day);
 - c. the organic compound content for each coating employed, in pounds per gallon;

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- d. the organic compound emissions from each coating employed, in lbs/day ("b" times "c");
 - e. the total organic compound emissions from all coating materials employed, in lbs/day (sum of "d" for all coatings);
 - f. the total number of hours the emissions unit was in operation; and
 - g. the OC emission rate, as an hourly average, in pounds ("e" divided by "f").
2. The permittee shall collect and record the following information each month for cleanup material usage in emissions unit R008:
- a. the company identification of each cleanup material employed;
 - b. documentation of whether or not each cleanup material employed is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5);
 - c. documentation of whether or not each cleanup material employed is a volatile organic compound as defined in OAC rule 3745-21-01(B)(6) and 40 CFR 51.100(s);
 - d. the number of gallons of each cleanup material employed (gallons/month);
 - e. the organic compound content for each cleanup material employed , in pounds per gallon;
 - f. the organic compound emissions from each cleanup material employed, in lbs/month ("d" times "e"); and
 - g. the total organic compound emissions from all cleanup materials employed, in lbs/month (sum of "f" for all cleanup materials).
3. At the end of each year the permittee shall collect and record the following information for annual emissions reporting and demonstration of compliance with the ton per year limits:
- a. the annual organic compound emissions from all coatings employed and recorded in Section A.III.1 above, the sum of each calendar day from January 1 to December 31; and
 - b. the annual organic compound emissions from all cleanup materials employed and recorded in Section A.III.2 above, the sum of each calendar month from January through December.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which include the following information:
 - a. an identification of each day during which the average hourly organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. an identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
2. The permittee shall notify the Director (the Ohio EPA Northwest District Office) in writing of any monthly record showing the use of a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), for cleanup operations. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northwest District Office) within 30 days following the end of the calendar month.
3. The permittee shall notify the Director (the Ohio EPA Northwest District Office) in writing of any monthly record showing the use of a volatile organic compound, as defined in OAC rule 3745-21-01(B)(6) and/or 40 CFR 51.100(s), for cleanup operations. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northwest District Office) within 30 days following the end of the calendar month.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I.1 of these terms and conditions shall be determined in accordance with the following method(s):
 - a. **Emission Limitation**
8 pounds/hour of OC emissions from coating operations

Applicable Compliance Method
Compliance with hourly organic compound emission limit shall be based upon the record keeping requirements contained in Section A.III.1 of this permit.
 - b. **Emission Limitation**
40 pounds/day of OC emissions from coating operations

Applicable Compliance Method
Compliance with daily organic compound emission limit shall be based upon the record keeping requirements contained in Section A.III.1 of this permit.
 - c. **Emission Limitation**
7.30 tons/year of OC emissions from coating operations

Applicable Compliance Method

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Compliance shall be determined based upon the recordkeeping requirements specified in Section A.III.1.

- d. **Emission Limitation**
27.5 lbs OC/month from cleanup operations

Applicable Compliance Method

Compliance shall be determined based upon the recordkeeping requirements specified in Section A.III.2.

Emission Limitation

0.17 tons OC/yr from cleanup operations

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Applicable Compliance Method

Compliance shall be determined based upon the recordkeeping requirements specified in Section A.III.2.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

VI. Miscellaneous Requirements

None

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Emissions Unit ID: R008

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B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Semi-Automatic Spray Booth Decorator #2, with dry filtration (Modification of existing emissions unit to establish synthetic minor limitations)	None	None

2. Additional Terms and Conditions

- 2.a Upon the permittee's demonstration of compliance with the final National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products, 40 CFR 63 Subpart PPPP, the following Air Toxic Policy shall no longer apply.

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

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None

Emissions Unit ID: R008

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Emissions Unit ID: R008

Issued: To be entered upon final issuance**VI. Miscellaneous Requirements**

Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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Emissions Unit ID: R009

Issued: To be entered upon final issuance

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R009 - Maintenance Decorator, with dry filtration (Modification of existing emissions unit to establish synthetic minor limitations)	OAC rule 3745-31-05(A)(3)	Emissions of organic compounds (OC) shall not exceed 8 pounds/hour and 40 pounds/day from coating operations.
		7.30 tons organic compounds (OC)/yr from coating operations
		27.5 lbs organic compounds (OC)/month, 0.17 tons OC/yr from cleanup operations (see Sections A.I.2.e, A.II.1, and A.II.2).
	OAC rule 3745-31-05(C)	See Section A.I.2.d.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3), see Section A.2.c.
	OAC rule 3745-17-11(A)	See Section A.I.2.a.
	OAC rule 3745-17-07(A)	See Section A.I.2.b.
	40 CFR Part 63, Subpart PPPP	See Section A of Part II - FACILITY SPECIFIC TERMS AND CONDITIONS.

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

- 2.a** The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), this emissions unit is exempt from the requirements of OAC rule 3745-17-11(B)(2).
- 2.b** This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because OAC rule 3745-17-11 is not applicable.
- 2.c** The requirements of OAC rule 3745-31-05(A)(3) that emissions of organic compounds (OC) shall not exceed 8 pounds/hour and 40 pounds/day applies on all days even when only non-photochemically reactive materials are used. Photochemically reactive materials is defined in OAC rule 3745-21-01(C)(5).
- 2.d** This permit establishes federally enforceable limitations on emissions of organic compounds (OC) for the purpose of limiting the potential to emit to avoid applicability of the Prevention of Significant Deterioration (PSD) rules. This limitation shall be established through OAC rule 3745-31-05(A)(3), by limiting each emissions unit to no more than 40 pounds of OCs per day. For purposes of federal enforceability a limitation on OCs effectively restricts VOCs.
- 2.e** The emission limitation for cleanup operations involves organic compounds which do not participate in atmospheric photochemical reactions (see Section A.II.2) and therefore, are not considered volatile organic compounds as defined in OAC rule 3745-21-01 and 40 CFR 51.100(s).

II. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), for cleanup operations in this emissions unit is prohibited.
2. The use of volatile organic compounds, as defined in OAC rule 3745-21-01(B)(6) and 40 CFR 51.100(s), for cleanup operations in this emissions unit is prohibited.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for coating usage in emissions unit R009:
 - a. the company identification for each coating employed;

- b. the number of gallons of each coating employed (gallons/day);
 - c. the organic compound content for each coating employed, in pounds per gallon;
 - d. the organic compound emissions from each coating employed, in lbs/day ("b" times "c");
 - e. the total organic compound emissions from all coating materials employed, in lbs/day (sum of "d" for all coatings);
 - f. the total number of hours the emissions unit was in operation; and
 - g. the OC emission rate, as an hourly average, in pounds ("e" divided by "f").
2. The permittee shall collect and record the following information each month for cleanup material usage in emissions unit R009:
- a. the company identification of each cleanup material employed;
 - b. documentation of whether or not each cleanup material employed is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5);
 - c. documentation of whether or not each cleanup material employed is a volatile organic compound as defined in OAC rule 3745-21-01(B)(6) and 40 CFR 51.100(s);
 - d. the number of gallons of each cleanup material employed (gallons/month);
 - e. the organic compound content for each cleanup material employed, in pounds per gallon;
 - f. the organic compound emissions from each cleanup material employed, in lbs/month ("d" times "e"); and
 - g. the total organic compound emissions from all cleanup materials employed, in lbs/month (sum of "f" for all cleanup materials).
3. At the end of each year the permittee shall collect and record the following information for annual emissions reporting and demonstration of compliance with the ton per year limits:
- a. the annual organic compound emissions from all coatings employed and recorded in Section A.III.1 above, the sum of each calendar day from January 1 to December 31; and
 - b. the annual organic compound emissions from all cleanup materials employed and recorded in Section A.III.2 above, the sum of each calendar month from January through December.

IV. Reporting Requirements

Issued: To be entered upon final issuance

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which include the following information:
 - a. an identification of each day during which the average hourly organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. an identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

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2. The permittee shall notify the Director (the Ohio EPA Northwest District Office) in writing of any monthly record showing the use of a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), for cleanup operations. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northwest District Office) within 30 days following the end of the calendar month.
3. The permittee shall notify the Director (the Ohio EPA Northwest District Office) in writing of any monthly record showing the use of a volatile organic compound, as defined in OAC rule 3745-21-01(B)(6) and/or 40 CFR 51.100(s), for cleanup operations. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northwest District Office) within 30 days following the end of the calendar month.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I.1 of these terms and conditions shall be determined in accordance with the following method(s):
 - a. **Emission Limitation**
8 pounds/hour of OC emissions from coating operations

Applicable Compliance Method
Compliance with hourly organic compound emission limit shall be based upon the record keeping requirements contained in Section A.III.1 of this permit.
 - b. **Emission Limitation**
40 pounds/day of OC emissions from coating operations

Applicable Compliance Method
Compliance with daily organic compound emission limit shall be based upon the record keeping requirements contained in Section A.III.1 of this permit.
 - c. **Emission Limitation**
7.30 tons/year of OC emissions from coating operations

Applicable Compliance Method
Compliance shall be determined based upon the recordkeeping requirements specified in Section A.III.1.
 - d. **Emission Limitation**
27.5 lbs OC/month from cleanup operations

Hedstrom Corporation
PTI Application: 02 16030
Issued

Facility ID: 0303010045

Emissions Unit ID: R009

Applicable Compliance Method

Compliance shall be determined based upon the recordkeeping requirements specified in Section A.III.2.

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PTI A

Emissions Unit ID: R009

Issued: To be entered upon final issuance

Emission Limitation

0.17 tons OC/yr from cleanup operations

Applicable Compliance Method

Compliance shall be determined based upon the recordkeeping requirements specified in Section A.III.2.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

VI. Miscellaneous Requirements

None

Hedst

PTI A

Emissions Unit ID: R009

Issued: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Maintenance Decorator, with dry filtration (Modification of existing emissions unit to establish synthetic minor limitations)	None	None

2. Additional Terms and Conditions

- 2.a Upon the permittee's demonstration of compliance with the final National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products, 40 CFR 63 Subpart PPPP, the following Air Toxic Policy shall no longer apply.

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

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PTI A

Issued: To be entered upon final issuance

Emissions Unit ID: R009

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Emissions Unit ID: R009

Issued: To be entered upon final issuance**VI. Miscellaneous Requirements**

Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Issued: To be entered upon final issuance

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R027 - 6-inch 360 Degree Tampo Printer (Modification of existing emissions unit to establish synthetic minor limitations)	OAC rule 3745-31-03(A)(3)	Emissions of organic compounds (OC) shall not exceed 8 pounds/hour and 40 pounds/day from coating operations.
		7.30 tons organic compounds (OC)/yr from coating operations
		1181.0 lbs organic compounds (OC)/month, 7.09 tons OC/yr from cleanup operations (see Sections A.I.2.c, A.II.1, and A.II.2.)
	OAC rule 3745-31-05(C)	See Section A.I.2.b.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3), see Section A.2.a.
	40 CFR Part 63, Subpart PPPP	See Section A of Part II - FACILITY SPECIFIC TERMS AND CONDITIONS.

2. Additional Terms and Conditions

- 2.a The requirements of OAC rule 3745-31-05(A)(3) that emissions of organic compounds

Emissions Unit ID: R027

(OC) shall not exceed 8 pounds/hour and 40 pounds/day applies on all days even when only non-photochemically reactive materials are used. Photochemically reactive materials is defined in OAC rule 3745-21-01(C)(5).

- 2.b** This permit establishes federally enforceable limitations on emissions of organic compounds (OC) for the purpose of limiting the potential to emit to avoid applicability of the Prevention of Significant Deterioration (PSD) rules. This limitation shall be established through OAC rule 3745-31-05(A)(3), by limiting each emissions unit to no more than 40 pounds of OCs per day. For purposes of federal enforceability a limitation on OCs effectively restricts VOCs.
- 2.c** The emission limitation for cleanup operations involves organic compounds which do not participate in atmospheric photochemical reactions (see Section A.II.2) and therefore, are not considered volatile organic compounds as defined in OAC rule 3745-21-01 and 40 CFR 51.100(s).

II. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), for cleanup operations in this emissions unit is prohibited.
2. The use of volatile organic compounds, as defined in OAC rule 3745-21-01(B)(6) and 40 CFR 51.100(s), for cleanup operations in this emissions unit is prohibited.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for coating usage in emissions unit R027:
 - a. the company identification for each coating employed;
 - b. the number of gallons of each coating employed (gallons/day);
 - c. the organic compound content for each coating employed, in pounds per gallon;
 - d. the organic compound emissions from each coating employed, in lbs/day ("b" times "c");
 - e. the total organic compound emissions from all coating materials employed, in lbs/day (sum of "d" for all coatings);
 - f. the total number of hours the emissions unit was in operation; and
 - g. the OC emission rate, as an hourly average, in pounds ("e" divided by "f").
2. The permittee shall collect and record the following information each month for cleanup material usage in emissions unit R0027:

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- a. the company identification of each cleanup material employed;
 - b. documentation of whether or not each cleanup material employed is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5);
 - c. documentation of whether or not each cleanup material employed is a volatile organic compound as defined in OAC rule 3745-21-01(B)(6) and 40 CFR 51.100(s);
 - d. the number of gallons of each cleanup material employed (gallons/month);
 - e. the organic compound content for each cleanup material employed , in pounds per gallon;
 - f. the organic compound emissions from each cleanup material employed, in lbs/month ("d" times "e"); and
 - g. the total organic compound emissions from all cleanup materials employed, in lbs/month (sum of "f" for all cleanup materials).
3. At the end of each year the permittee shall collect and record the following information for annual emissions reporting and demonstration of compliance with the ton per year limits:
- a. the annual organic compound emissions from all coatings employed and recorded in Section A.III.1 above, the sum of each calendar day from January 1 to December 31; and
 - b. the annual organic compound emissions from all cleanup materials employed and recorded in Section A.III.2 above, the sum of each calendar month from January through December.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which include the following information:
 - a. an identification of each day during which the average hourly organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. an identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual organic emissions for each such day.

Emissions Unit ID: R027

2. The permittee shall notify the Director (the Ohio EPA Northwest District Office) in writing of any monthly record showing the use of a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), for cleanup operations. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northwest District Office) within 30 days following the end of the calendar month.
3. The permittee shall notify the Director (the Ohio EPA Northwest District Office) in writing of any monthly record showing the use of a volatile organic compound, as defined in OAC rule 3745-21-01(B)(6) and/or 40 CFR 51.100(s), for cleanup operations. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northwest District Office) within 30 days following the end of the calendar month.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):
 - a. **Emission Limitation**
8 pounds/hour of OC emissions from coating operations

Applicable Compliance Method
Compliance with hourly organic compound emission limit shall be based upon the record keeping requirements contained in Section A.III.1 of this permit.
 - b. **Emission Limitation**
40 pounds/day of OC emissions from coating operations

Applicable Compliance Method
Compliance with daily organic compound emission limit shall be based upon the record keeping requirements contained in Section A.III.1 of this permit.
 - c. **Emission Limitation**
7.30 tons/year of OC emissions from coating operations

Applicable Compliance Method
Compliance shall be determined based upon the recordkeeping requirements specified in Section A.III.1.
 - d. **Emission Limitation**
1181.0 lbs OC/month from cleanup operations

Applicable Compliance Method
Compliance shall be determined based upon the recordkeeping requirements specified in Section A.III.2.

Emission Limitation

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Emissions Unit ID: R027

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7.09 tons OC/yr from cleanup operations

Applicable Compliance Method

Compliance shall be determined based upon the recordkeeping requirements specified in Section A.III.2.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

VI. Miscellaneous Requirements

None

Hedst

PTI A

Emissions Unit ID: R027

Issued: To be entered upon final issuance**B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
6-inch 360 Degree Tampo Printer (Modification of existing emissions unit to establish synthetic minor limitations)	None	None

2. Additional Terms and Conditions

- 2.a Upon the permittee's demonstration of compliance with the final National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products, 40 CFR 63 Subpart PPPP, the following Air Toxic Policy shall no longer apply.

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

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Emissions Unit ID: R027

None

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Emissions Unit ID: R027

Issued: To be entered upon final issuance**VI. Miscellaneous Requirements**

Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
10-inch 360 Degree Printer-#3- top (Modification of PTI 03-0174 issued on 9/3/97 to establish synthetic minor limitations)	OAC rule 3745-31-03(A)(3)	Emissions of organic compounds (OC) shall not exceed 8 pounds/hour and 40 pounds/day from coating operations 7.30 tons organic compounds (OC)/yr from coating operations 1181.0 lbs organic compounds (OC)/month, 7.09 tons OC/yr from cleanup operations (see Sections A.I.2.c, A.II.1 and A.II.2.)
	OAC rule 3745-31-05(C)	See Section A.I.2.b.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3), see Section A.2.a.
	40 CFR Part 63, Subpart PPPP	See Section A of Part II - FACILITY SPECIFIC TERMS AND CONDITIONS.

2. Additional Terms and Conditions

- 2.a The requirements of OAC rule 3745-31-05(A)(3) that emissions of organic compounds (OC) shall not exceed 8 pounds/hour and 40 pounds/day applies on all days even when only non-photochemically reactive materials are used. Photochemically reactive materials is defined in OAC rule 3745-21-01(C)(5).
- 2.b This permit establishes federally enforceable limitations on emissions of organic

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compounds (OC) for the purpose of limiting the potential to emit to avoid applicability of the Prevention of Significant Deterioration (PSD) rules. This limitation shall be established through OAC rule 3745-31-05(A)(3), by limiting each emissions unit to no more than 40 pounds of OCs per day. For purposes of federal enforceability a limitation on OCs effectively restricts VOCs.

- 2.c** The emission limitation for cleanup operations involves organic compounds which do not participate in atmospheric photochemical reactions (See Section A.II.2) and therefore, are not considered volatile organic compounds as defined in OAC rule 3745-21-01 and 40 CFR 51.100(s).

II. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), for cleanup operations in this emissions unit is prohibited.
2. The use of volatile organic compounds, as defined in OAC rule 3745-21-01(B)(6) and 40 CFR 51.100(s), for cleanup operations in this emissions unit is prohibited.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for coating usage in emissions unit R031:
 - a. the company identification for each coating employed;
 - b. the number of gallons of each coating employed (gallons/day);
 - c. the organic compound content for each coating employed, in pounds per gallon;
 - d. the organic compound emissions from each coating employed, in lbs/day ("b" times "c");
 - e. the total organic compound emissions from all coating materials employed, in lbs/day (sum of "d" for all coatings);
 - f. the total number of hours the emissions unit was in operation; and
 - g. the OC emission rate, as an hourly average, in pounds ("e" divided by "f").
2. The permittee shall collect and record the following information each month for cleanup material usage in emissions unit R031:

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- a. the company identification of each cleanup material employed;
 - b. documentation of whether or not each cleanup material employed is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5);
 - c. documentation of whether or not each cleanup material employed is a volatile organic compound as defined in OAC rule 3745-21-01(B)(6) and 40 CFR 51.100(s);
 - d. the number of gallons of each cleanup material employed (gallons/month);
 - e. the organic compound content for each cleanup material employed , in pounds per gallon;
 - f. the organic compound emissions from each cleanup material employed, in lbs/month ("d" times "e"); and
 - g. the total organic compound emissions from all cleanup materials employed, in lbs/month (sum of "f" for all cleanup materials).
3. At the end of each year the permittee shall collect and record the following information for annual emissions reporting and demonstration of compliance with the ton per year limits:
- a. the annual organic compound emissions from all coatings employed and recorded in Section A.III.1 above, the sum of each calendar day from January 1 to December 31; and
 - b. the annual organic compound emissions from all cleanup materials employed and recorded in Section A.III.2 above, the sum of each calendar month from January through December.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which include the following information:
 - a. an identification of each day during which the average hourly organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. an identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual organic emissions for each such day.

Emissions Unit ID: R031

2. The permittee shall notify the Director (the Ohio EPA Northwest District Office) in writing of any monthly record showing the use of a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), for cleanup operations. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northwest District Office) within 30 days following the end of the calendar month.
3. The permittee shall notify the Director (the Ohio EPA Northwest District Office) in writing of any monthly record showing the use of a volatile organic compound, as defined in OAC rule 3745-21-01(B)(6) and/or 40 CFR 51.100(s), for cleanup operations. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northwest District Office) within 30 days following the end of the calendar month.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I.1 of these terms and conditions shall be determined in accordance with the following method(s):
 - a. **Emission Limitation**
8 pounds/hour of OC emissions from coating operations

Applicable Compliance Method
Compliance with hourly organic compound emission limit shall be based upon the record keeping requirements contained in Section A.III.1 of this permit.
 - b. **Emission Limitation**
40 pounds/day of OC emissions from coating operations

Applicable Compliance Method
Compliance with daily organic compound emission limit shall be based upon the record keeping requirements contained in Section A.III.1 of this permit.
 - c. **Emission Limitation**
7.30 tons/year of OC emissions from coating operations

Applicable Compliance Method
Compliance shall be determined based upon the recordkeeping requirements specified in Section A.III.1.
 - d. **Emission Limitation**
1181.0 lbs OC/month from cleanup operations

Applicable Compliance Method
Compliance shall be determined based upon the recordkeeping requirements specified in Section A.III.2.

Emission Limitation

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Emissions Unit ID: R031

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7.09 tons OC/yr from cleanup operations

Applicable Compliance Method

Compliance shall be determined based upon the recordkeeping requirements specified in Section A.III.2.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

VI. Miscellaneous Requirements

None

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PTI A

Emissions Unit ID: R031

Issued: To be entered upon final issuance**B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
10-inch 360 Degree Printer-#3- top (Modification of PTI 03-0174 issued on 9/3/97 to establish synthetic minor limitations)	None	None

2. Additional Terms and Conditions

- 2.a Upon the permittee's demonstration of compliance with the final National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products, 40 CFR 63 Subpart PPPP, the following Air Toxic Policy shall no longer apply.

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

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Hedstrom Corporation
PTI Application: 02 16030
Issued

Facility ID: 0303010045

Emissions Unit ID: R031

Hedst**PTI A**

Emissions Unit ID: R031

Issued: To be entered upon final issuance**VI. Miscellaneous Requirements**

Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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PTI A

Emissions Unit ID: R032

Issued: To be entered upon final issuance

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R032 - 10-inch 360 Degree Printer- #3- bottom (Modification of PTI 03-0174 issued on 9/3/97 to establish synthetic minor limitations)	OAC rule 3745-31-03(A)(3)	Emissions of organic compounds (OC) shall not exceed 8 pounds/hour and 40 pounds/day from coating operations 7.30 tons organic compounds (OC)/yr from coating operations 1181.0 lbs organic compounds (OC)/month, 7.09 tons OC/yr from cleanup operations (see Sections A.I.2.c, A.II.1 and A.II.2.)
	OAC rule 3745-31-05(C)	See Section A.I.2.b.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3), see Section A.2.a.
	40 CFR Part 63, Subpart PPPP	See Section A of Part II - FACILITY SPECIFIC TERMS AND CONDITIONS.

2. Additional Terms and Conditions

- 2.a The requirements of OAC rule 3745-31-05(A)(3) that emissions of organic compounds

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(OC) shall not exceed 8 pounds/hour and 40 pounds/day applies on all days even when only non-photochemically reactive materials are used. Photochemically reactive materials is defined in OAC rule 3745-21-01(C)(5).

- 2.b** This permit establishes federally enforceable limitations on emissions of organic compounds (OC) for the purpose of limiting the potential to emit to avoid applicability of the Prevention of Significant Deterioration (PSD) rules. This limitation shall be established through OAC rule 3745-31-05(A)(3), by limiting each emissions unit to no more than 40 pounds of OCs per day. For purposes of federal enforceability a limitation on OCs effectively restricts VOCs.
- 2.c** The emission limitation for cleanup operations involves organic compounds which do not participate in atmospheric photochemical reactions (See Section A.II.2) and therefore, are not considered volatile organic compounds as defined in OAC rule 3745-21-01 and 40 CFR 51.100(s).

II. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), for cleanup operations in this emissions unit is prohibited.
2. The use of volatile organic compounds, as defined in OAC rule 3745-21-01(B)(6) and 40 CFR 51.100(s), for cleanup operations in this emissions unit is prohibited.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for coating usage in emissions unit R032:
 - a. the company identification for each coating employed;
 - b. the number of gallons of each coating employed (gallons/day);
 - c. the organic compound content for each coating employed, in pounds per gallon;
 - d. the organic compound emissions from each coating employed, in lbs/day ("b" times "c");
 - e. the total organic compound emissions from all coating materials employed, in lbs/day (sum of "d" for all coatings);
 - f. the total number of hours the emissions unit was in operation; and

- g. the OC emission rate, as an hourly average, in pounds ("e" divided by "f").
2. The permittee shall collect and record the following information each month for cleanup material usage in emissions unit R032:
 - a. the company identification of each cleanup material employed;
 - b. documentation of whether or not each cleanup material employed is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5);
 - c. documentation of whether or not each cleanup material employed is a volatile organic compound as defined in OAC rule 3745-21-01(B)(6) and 40 CFR 51.100(s);
 - d. the number of gallons of each cleanup material employed (gallons/month);
 - e. the organic compound content for each cleanup material employed, in pounds per gallon;
 - f. the organic compound emissions from each cleanup material employed, in lbs/month ("d" times "e"); and
 - g. the total organic compound emissions from all cleanup materials employed, in lbs/month (sum of "f" for all cleanup materials).
3. At the end of each year the permittee shall collect and record the following information for annual emissions reporting and demonstration of compliance with the ton per year limits:
 - a. the annual organic compound emissions from all coatings employed and recorded in Section A.III.1 above, the sum of each calendar day from January 1 to December 31; and
 - b. the annual organic compound emissions from all cleanup materials employed and recorded in Section A.III.2 above, the sum of each calendar month from January through December.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which include the following information:
 - a. an identification of each day during which the average hourly organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. an identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual organic emissions for each such day.

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PTI A

Emissions Unit ID: R032

Issued: To be entered upon final issuance

2. The permittee shall notify the Director (the Ohio EPA Northwest District Office) in writing of any monthly record showing the use of a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), for cleanup operations. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northwest District Office) within 30 days following the end of the calendar month.
3. The permittee shall notify the Director (the Ohio EPA Northwest District Office) in writing of any monthly record showing the use of a volatile organic compound, as defined in OAC rule 3745-21-01(B)(6) and/or 40 CFR 51.100(s), for cleanup operations. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northwest District Office) within 30 days following the end of the calendar month.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I.1 of these terms and conditions shall be determined in accordance with the following method(s):
 - a. **Emission Limitation**
8 pounds/hour of OC emissions from coating operations

Applicable Compliance Method
Compliance with hourly organic compound emission limit shall be based upon the record keeping requirements contained in Section A.III.1 of this permit.
 - b. **Emission Limitation**
40 pounds/day of OC emissions from coating operations

Applicable Compliance Method
Compliance with daily organic compound emission limit shall be based upon the record keeping requirements contained in Section A.III.1 of this permit.
 - c. **Emission Limitation**
7.30 tons/year of OC emissions from coating operations

Applicable Compliance Method
Compliance shall be determined based upon the recordkeeping requirements specified in Section A.III.1.
 - d. **Emission Limitation**
1181.0 lbs OC/month from cleanup operations

Hedstrom Corporation
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Issued

Facility ID: 0303010045

Emissions Unit ID: R032

Applicable Compliance Method

Compliance shall be determined based upon the recordkeeping requirements specified in Section A.III.2.

Emission Limitation

7.09 tons OC/yr from cleanup operations

Applicable Compliance Method

Compliance shall be determined based upon the recordkeeping requirements specified in Section A.III.2.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

VI. Miscellaneous Requirements

None

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Emissions Unit ID: R032

Issued: To be entered upon final issuance**B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
10-inch 360 Degree Printer-#3- bottom (Modification of PTI 03-0174 issued on 9/3/97 to establish synthetic minor limitations)	None	None

2. Additional Terms and Conditions

- 2.a Upon the permittee's demonstration of compliance with the final National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products, 40 CFR 63 Subpart PPPP, the following Air Toxic Policy shall no longer apply.

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

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Emissions Unit ID: R032

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Emissions Unit ID: R032

Issued: To be entered upon final issuance**VI. Miscellaneous Requirements**

Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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Emissions Unit ID: R033

Issued: To be entered upon final issuance**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
10-inch 360 Degree Printer-#1- top (Modification of PTI 03-11354 issued on 10/15/98 to establish synthetic minor limitations)	OAC rule 3745-31-03(A)(3)	Emissions of organic compounds (OC) shall not exceed 8 pounds/hour and 40 pounds/day from coating operations 7.30 tons organic compounds (OC)/yr from coating operations 1181.0 lbs organic compounds (OC)/month, 7.09 tons OC/yr from cleanup operations (see Sections A.I.2.c, A.II.1 and A.II.2.)
	OAC rule 3745-31-05(C)	See Section A.I.2.b.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3), see Section A.2.a
	40 CFR Part 63, Subpart PPPP	See Section A of Part II - FACILITY SPECIFIC TERMS AND CONDITIONS.

2. Additional Terms and Conditions

- 2.a The requirements of OAC rule 3745-31-05(A)(3) that emissions of organic compounds

Emissions Unit ID: R033

(OC) shall not exceed 8 pounds/hour and 40 pounds/day applies on all days even when only non-photochemically reactive materials are used. Photochemically reactive materials is defined in OAC rule 3745-21-01(C)(5).

- 2.b** This permit establishes federally enforceable limitations on emissions of organic compounds (OC) for the purpose of limiting the potential to emit to avoid applicability of the Prevention of Significant Deterioration (PSD) rules. This limitation shall be established through OAC rule 3745-31-05(A)(3), by limiting each emissions unit to no more than 40 pounds of OCs per day. For purposes of federal enforceability a limitation on OCs effectively restricts VOCs.
- 2.c** The emission limitation for cleanup operations involves organic compounds which do not participate in atmospheric photochemical reactions (See Section A.II.2) and therefore, are not considered volatile organic compounds as defined in OAC rule 3745-21-01 and 40 CFR 51.100(s).

II. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), for cleanup operations in this emissions unit is prohibited.
2. The use of volatile organic compounds, as defined in OAC rule 3745-21-01(B)(6) and 40 CFR 51.100(s), for cleanup operations in this emissions unit is prohibited.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for coating usage in emissions unit R033:
 - a. the company identification for each coating employed;
 - b. the number of gallons of each coating employed (gallons/day);
 - c. the organic compound content for each coating employed, in pounds per gallon;
 - d. the organic compound emissions from each coating employed, in lbs/day ("b" times "c");
 - e. the total organic compound emissions from all coating materials employed, in lbs/day (sum of "d" for all coatings);
 - f. the total number of hours the emissions unit was in operation; and
 - g. the OC emission rate, as an hourly average, in pounds ("e" divided by "f").
2. The permittee shall collect and record the following information each month for cleanup material usage in emissions unit R033:

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- a. the company identification of each cleanup material employed;
 - b. documentation of whether or not each cleanup material employed is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5);
 - c. documentation of whether or not each cleanup material employed is a volatile organic compound as defined in OAC rule 3745-21-01(B)(6) and 40 CFR 51.100(s);
 - d. the number of gallons of each cleanup material employed (gallons/month);
 - e. the organic compound content for each cleanup material employed , in pounds per gallon;
 - f. the organic compound emissions from each cleanup material employed, in lbs/month ("d" times "e"); and
 - g. the total organic compound emissions from all cleanup materials employed, in lbs/month (sum of "f" for all cleanup materials).
3. At the end of each year the permittee shall collect and record the following information for annual emissions reporting and demonstration of compliance with the ton per year limits:
- a. the annual organic compound emissions from all coatings employed and recorded in Section A.III.1 above, the sum of each calendar day from January 1 to December 31; and
 - b. the annual organic compound emissions from all cleanup materials employed and recorded in Section A.III.2 above, the sum of each calendar month from January through December.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which include the following information:
 - a. an identification of each day during which the average hourly organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. an identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual organic emissions for each such day.

Emissions Unit ID: R033

2. The permittee shall notify the Director (the Ohio EPA Northwest District Office) in writing of any monthly record showing the use of a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), for cleanup operations. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northwest District Office) within 30 days following the end of the calendar month.
3. The permittee shall notify the Director (the Ohio EPA Northwest District Office) in writing of any monthly record showing the use of a volatile organic compound, as defined in OAC rule 3745-21-01(B)(6) and/or 40 CFR 51.100(s), for cleanup operations. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northwest District Office) within 30 days following the end of the calendar month.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I.1 of these terms and conditions shall be determined in accordance with the following method(s):
 - a. **Emission Limitation**
8 pounds/hour of OC emissions from coating operations

Applicable Compliance Method
Compliance with hourly organic compound emission limit shall be based upon the record keeping requirements contained in Section A.III.1 of this permit.
 - b. **Emission Limitation**
40 pounds/day of OC emissions from coating operations

Applicable Compliance Method
Compliance with daily organic compound emission limit shall be based upon the record keeping requirements contained in Section A.III.1 of this permit.
 - c. **Emission Limitation**
7.30 tons/year of OC emissions from coating operations

Applicable Compliance Method
Compliance shall be determined based upon the recordkeeping requirements specified in Section A.III.1.
 - d. **Emission Limitation**
1181.0 lbs OC/month from cleanup operations

Applicable Compliance Method
Compliance shall be determined based upon the recordkeeping requirements specified in Section A.III.2.

Emission Limitation

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7.09 tons OC/yr from cleanup operations

Applicable Compliance Method

Compliance shall be determined based upon the recordkeeping requirements specified in Section A.III.2.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

VI. Miscellaneous Requirements

None

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Emissions Unit ID: R033

Issued: To be entered upon final issuance**B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
10-inch 360 Degree Printer-#-1 top (Modification of PTI 03-11354 issued on 10/15/98 to establish synthetic minor limitations)	None	None

2. Additional Terms and Conditions

- 2.a Upon the permittee's demonstration of compliance with the final National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products, 40 CFR 63 Subpart PPPP, the following Air Toxic Policy shall no longer apply.

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

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Emissions Unit ID: R033

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Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R034 - 10-inch 360 Degree Printer-#1- bottom (Modification of PTI 03-11354 issued on 10/15/98 to establish synthetic minor limitations)	OAC rule 3745-31-03(A)(3)	Emissions of organic compounds (OC) shall not exceed 8 pounds/hour and 40 pounds/day from coating operations 7.30 tons organic compounds (OC)/yr from coating operations 1181.0 lbs organic compounds (OC)/month, 7.09 tons OC/yr from cleanup operations (see Sections A.I.2.c, A.II.1 and A.II.2.)
	OAC rule 3745-31-05(C)	See Section A.I.2.b.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3), see Section A.2.a.
	40 CFR Part 63, Subpart PPPP	See Section A of Part II - FACILITY SPECIFIC TERMS AND CONDITIONS.

2. Additional Terms and Conditions

- 2.a The requirements of OAC rule 3745-31-05(A)(3) that emissions of organic compounds (OC) shall not exceed 8 pounds/hour and 40 pounds/day applies on all days even when only non-photochemically reactive materials are used. Photochemically reactive materials is defined in OAC rule 3745-21-01(C)(5).
- 2.b This permit establishes federally enforceable limitations on emissions of organic

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compounds (OC) for the purpose of limiting the potential to emit to avoid applicability of the Prevention of Significant Deterioration (PSD) rules. This limitation shall be established through OAC rule 3745-31-05(A)(3), by limiting each emissions unit to no more than 40 pounds of OCs per day. For purposes of federal enforceability a limitation on OCs effectively restricts VOCs.

- 2.c** The emission limitation for cleanup operations involves organic compounds which do not participate in atmospheric photochemical reactions (See Section A.II.2) and therefore, are not considered volatile organic compounds as defined in OAC rule 3745-21-01 and 40 CFR 51.100(s).

II. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), for cleanup operations in this emissions unit is prohibited.
2. The use of volatile organic compounds, as defined in OAC rule 3745-21-01(B)(6) and 40 CFR 51.100(s), for cleanup operations in this emissions unit is prohibited.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for coating usage in emissions unit R034:
 - a. the company identification for each coating employed;
 - b. the number of gallons of each coating employed (gallons/day);
 - c. the organic compound content for each coating employed, in pounds per gallon;
 - d. the organic compound emissions from each coating employed, in lbs/day ("b" times "c");
 - e. the total organic compound emissions from all coating materials employed, in lbs/day (sum of "d" for all coatings);
 - f. the total number of hours the emissions unit was in operation; and
 - g. the OC emission rate, as an hourly average, in pounds ("e" divided by "f").
2. The permittee shall collect and record the following information each month for cleanup material usage in emissions unit R034:

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- a. the company identification of each cleanup material employed;
 - b. documentation of whether or not each cleanup material employed is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5);
 - c. documentation of whether or not each cleanup material employed is a volatile organic compound as defined in OAC rule 3745-21-01(B)(6) and 40 CFR 51.100(s);
 - d. the number of gallons of each cleanup material employed (gallons/month);
 - e. the organic compound content for each cleanup material employed , in pounds per gallon;
 - f. the organic compound emissions from each cleanup material employed, in lbs/month ("d" times "e"); and
 - g. the total organic compound emissions from all cleanup materials employed, in lbs/month (sum of "f" for all cleanup materials).
3. At the end of each year the permittee shall collect and record the following information for annual emissions reporting and demonstration of compliance with the ton per year limits:
- a. the annual organic compound emissions from all coatings employed and recorded in Section A.III.1 above, the sum of each calendar day from January 1 to December 31; and
 - b. the annual organic compound emissions from all cleanup materials employed and recorded in Section A.III.2 above, the sum of each calendar month from January through December.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which include the following information:
 - a. an identification of each day during which the average hourly organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. an identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual organic emissions for each such day.

Emissions Unit ID: R034

2. The permittee shall notify the Director (the Ohio EPA Northwest District Office) in writing of any monthly record showing the use of a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), for cleanup operations. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northwest District Office) within 30 days following the end of the calendar month.
3. The permittee shall notify the Director (the Ohio EPA Northwest District Office) in writing of any monthly record showing the use of a volatile organic compound, as defined in OAC rule 3745-21-01(B)(6) and/or 40 CFR 51.100(s), for cleanup operations. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northwest District Office) within 30 days following the end of the calendar month.

V. Testing Requirements

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

- a. **Emission Limitation**
8 pounds/hour of OC emissions from coating operations

Applicable Compliance Method

Compliance with hourly organic compound emission limit shall be based upon the record keeping requirements contained in Section A.III.1 of this permit.

- b. **Emission Limitation**
40 pounds/day of OC emissions from coating operations

Applicable Compliance Method

Compliance with daily organic compound emission limit shall be based upon the record keeping requirements contained in Section A.III.1 of this permit.

- c. **Emission Limitation**
7.30 tons/year of OC emissions from coating operations

Applicable Compliance Method

Compliance shall be determined based upon the recordkeeping requirements specified in Section A.III.1.

- d. **Emission Limitation**
1181.0 lbs OC/month from cleanup operations

Applicable Compliance Method

Compliance shall be determined based upon the recordkeeping requirements specified in Section A.III.2.

Emission Limitation

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Emissions Unit ID: R034

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7.09 tons OC/yr from cleanup operations

Applicable Compliance Method

Compliance shall be determined based upon the recordkeeping requirements specified in Section A.III.2.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

VI. Miscellaneous Requirements

None

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
10-inch 360 Degree Printer- #1- bottom (Modification of PTI 03-11354 issued on 10/15/98 to establish synthetic minor limitations)	None	None

2. Additional Terms and Conditions

- 2.a Upon the permittee's demonstration of compliance with the final National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products, 40 CFR 63 Subpart PPPP, the following Air Toxic Policy shall no longer apply.

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

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Emissions Unit ID: R034

Issued: To be entered upon final issuance**VI. Miscellaneous Requirements**

Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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Emissions Unit ID: R035

Issued: To be entered upon final issuance**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R035 - 10-inch Lacquer Line-#1, with dry filtration (Modification of PTI 03-13587 issued on 3/13/01 to establish synthetic minor limitations)	OAC rule 3745-31-05(A)(3)	16.0 lbs organic compounds (OC)/hr
		99.0 lbs organic compounds (OC)/month, 0.59 tons OC/yr from cleanup operations (see Sections A.I.2.d, A.II.1. and A.II.2.)
	OAC rule 3745-31-05(C)	41.34 tons OC per rolling 12-month period, see Section A.2.c.
	OAC rule 3745- 21-07 (G)(2)	See Section A.II.1.
	OAC rule 3745-17-11(A)	See Section A.I.2.a.
	OAC rule 3745-17-07(A)	See Section A.I.2.b.
	40 CFR Part 63, Subpart PPPP	See Section A of Part II - FACILITY SPECIFIC TERMS AND CONDITIONS.

2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), this emissions unit is exempt from the requirements of OAC rule 3745-17-11(B)(2).
- 2.b This emissions unit is exempt from the visible particulate emission limitations specified in

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OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because OAC rule 3745-17-11 is not applicable.

- 2.c** The permittee has requested a federally enforceable limitation of 41.34 tons of OC per rolling 12-month period based on hours of operation restriction (See B.II.3) for purposes of avoiding "Prevention of Significant Deterioration" applicability.
- 2.d** The emission limitation for cleanup operations involves organic compounds which do not participate in atmospheric photochemical reactions (See Section A.II.2) and therefore, are not considered volatile organic compounds as defined in OAC rule 3745-21-01 and 40 CFR 51.100(s).

II. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.
2. The use of volatile organic compounds, as defined in OAC rule 3745-21-01(B)(6) and 40 CFR 51.100(s), for cleanup operations in this emissions unit is prohibited.
3. The maximum annual hours of operation for emissions unit R035 shall not exceed 5,168 hours per year, based upon a rolling 12-month summation of the operating hours.

To ensure enforceability during the first 12 calendar months of operation 5,168 hours, the permittee shall not exceed the operating hours levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Operating Hours
1	431
1-2	862
1-3	1293
1-4	1724
1-5	2155
1-6	2586
1-7	3017
1-8	3448
1-9	3879
1-10	4310
1-11	4737
1-12	5168

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual operating hours limitation shall be based upon a rolling, 12-month summation of the operating hours.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit, R035:
 - a. the company identification for each coating employed;
 - b. documentation of whether or not each coating employed is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5);
 - c. the number of gallons of each coating employed (gallons/month);
 - d. the organic compound content for each coating employed, in pounds per gallon;
 - e. the organic compound emissions from each coating employed, in lbs/month ("c" times "d");
 - f. the total organic compound emissions from all coating materials employed (sum of "e" for all coatings);
 - g. beginning the first month after the first 12 calendar months of operation (following the issuance of this permit) the rolling, 12- month summation of the emission rate for OC, in tons;
 - h. the total number of hours the emissions unit was in operation;
 - i. during the first 12 calendar months of operation, (following the issuance of this permit) the cumulative hours of operation; and
 - j. beginning the first month after the first 12 calendar months of operation (following the issuance of this permit), the rolling 12 month summation of the hours of operation.
2. The permittee shall collect and record the following information each month for cleanup material usage in emissions unit R035:
 - a. the company identification of each cleanup material employed;
 - b. documentation of whether or not each cleanup material employed is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5);
 - c. documentation of whether or not each cleanup material employed is a volatile organic compound as defined in OAC rule 3745-21-01(B)(6) and 40 CFR 51.100(s);

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- d. the number of gallons of each cleanup material employed (gallons/month);
 - e. the organic compound content for each cleanup material employed, in pounds per gallon;
 - f. the organic compound emissions from each cleanup material employed, in lbs/month ("d" times "e"); and
 - g. the total organic compound emission rate for all cleanup materials employed (sum of "f" for all cleanup materials).
3. At the end of each year the permittee shall collect and record the following information for annual emissions reporting and demonstration of compliance with the ton per year limits:
 - a. the annual organic compound emissions from all coatings employed and recorded in Section A.III.1 above, the sum of each calendar month from January through December; and
 - b. the annual organic compound emissions from all cleanup materials employed and recorded in Section A.III.2 above, the sum of each calendar month from January through December.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA Northwest District Office) in writing of any monthly record showing the use of photochemically reactive materials for coating operations. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northwest District Office) within 30 days following the end of calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports which identify the following exceedances:
 - a. the rolling, 12-month hours of operation limitation;
 - b. the rolling, 12-month OC emissions limitation; and
 - c. for the first 12 calendar months of operation (following the issuance of this permit) all exceedances of the maximum allowable cumulative hours of operation.

These deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions of this permit.

Emissions Unit ID: R035

3. The permittee shall notify the Director (the Ohio EPA Northwest District Office) in writing of any monthly record showing the use of a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northwest District Office) within 30 days following the end of the calendar month.
4. The permittee shall notify the Director (the Ohio EPA Northwest District Office) in writing of any monthly record showing the use of a volatile organic compound, as defined in OAC rule 3745-21-01(B)(6) and/or 40 CFR 51.100(s), for cleanup operations. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northwest District Office) within 30 days following the end of the calendar month.

V. Testing Requirements

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

- a. **Emission Limitation:**

16.0 lbs OC/hr and 41.34 tons OC per rolling 12-month period from coating operations.

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit* for this emissions unit. Therefore no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit for this emissions unit is based on a maximum usage rate of 2.34 gallons of coating per hour and a maximum OC content of 6.83 pounds per gallon

Compliance with the OC per rolling 12-month period shall be demonstrated by the recordkeeping requirements in Section A.III.1.

- b. **Emission Limitation**

99.0 lbs OC/month from cleanup operations

Applicable Compliance Method

Compliance shall be determined based upon the recordkeeping requirements specified in Section A.III.2.

- c. **Emission Limitation**

0.59 tons OC/yr from cleanup operations

Applicable Compliance Method

Compliance shall be determined based upon the recordkeeping requirements specified in Section A.III.2.

- d. **Emission Limitation**

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Emissions Unit ID: R035

Issued: To be entered upon final issuance

The maximum annual hours of operation shall not exceed 5,168 hours per year, based upon a rolling 12-month summation of the operation hours

Applicable Compliance Method

Compliance shall be determined based upon the recordkeeping requirements specified in Section A.III.1.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

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VI. Miscellaneous Requirements

Emissions Unit ID: R035

None

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Emissions Unit ID: R035

Issued: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
10-inch Lacquer Line- #1- (Modification of PTI 03-13587 issued on 3/13/01 to establish synthetic minor limitations)	None	None

2. Additional Terms and Conditions

- 2.a Upon the permittee's demonstration of compliance with the final National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products, 40 CFR 63 Subpart PPPP, the following Air Toxic Policy shall no longer apply.

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit (R035) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

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Emissions Unit ID: R035

Pollutant: Acetone

TLV (mg/m3): 1187

Maximum Hourly Emission Rate (lbs/hr): 3.36

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 781.4

MAGLC (ug/m3): 28,261

Pollutant: N-Butyl Acetate

TLV (mg/m3): 7126

Maximum Hourly Emission Rate (lbs/hr): 8

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 1875

MAGLC (ug/m3): 16,966

Pollutant: Cyclohexanone

TLV (mg/m3): 9629

Maximum Hourly Emission Rate (lbs/hr): 0.85

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 199.3

MAGLC (ug/m3): 22,926

Pollutant: Ethyl Acetate

TLV (mg/m3): 1441

Maximum Hourly Emission Rate (lbs/hr): 2.46

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 574.4

MAGLC (ug/m3): 34,309

Physical changes to or changes in the method of operation of the emissions unit after its installation

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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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts 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.

IV. Reporting Requirements

None

V. Testing Requirements

None

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Emissions Unit ID: R035

VI. Miscellaneous Requirements

None

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Emissions Unit ID: R036

Issued: To be entered upon final issuance

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, - and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions <u>Limitations/Control</u> Measures</u>
R036 - 10-inch Lacquer Line- #2 with dry filtration (Modification of PTI 03-13587 issued on 3/13/01 to establish synthetic minor limitations)	OAC rule 3745-31-05(A)(3)	16.0 lbs organic compounds (OC)/hr
	OAC rule 3745-31-05(C)	99.0 lbs organic compounds (OC)/month, 0.59 tons OC/yr from cleanup operations (see Sections A.I.2.d, A.II.1. and A.II.2.)
	OAC rule 3745- 21-07 (G)(2)	41.34 tons OC per rolling 12-month period, see Section A.2.c.
	OAC rule 3745-17-11(A)	See Section A.II.1.
	OAC rule 3745-17-07(A)	See Section A.I.2.a.
	40 CFR Part 63, Subpart PPPP	See Section A.I.2.b.
	See Section A of Part II - FACILITY SPECIFIC TERMS AND CONDITIONS.	

2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), this emissions unit is exempt from the requirements of OAC rule 3745-17-11(B)(2).

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- 2.b** This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because OAC rule 3745-17-11 is not applicable.
- 2.c** The permittee has requested a federally enforceable limitation of 41.34 tons of OC per rolling 12-month period based on hours of operation restriction (See Section A.II.3.) for purposes of avoiding "Prevention of Significant Deterioration" applicability.
- 2.d** The emission limitation for cleanup operations involves organic compounds which do not participate in atmospheric photochemical reactions (See Section A.II.2) and therefore, are not considered volatile organic compounds as defined in OAC rule 3745-21-01 and 40 CFR 51.100(s).

II. Operational Restrictions

- The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.
- The use of volatile organic compounds, as defined in OAC rule 3745-21-01(B)(6) and 40 CFR 51.100(s), for cleanup operations in this emissions unit is prohibited.
- The maximum annual hours of operation for emissions unit R036 shall not exceed 5,168 hours per year, based upon a rolling 12-month summation of the operating hours.

To ensure enforceability during the first 12 calendar months of operation 5,168 hours, the permittee shall not exceed the operating hours levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Operating Hours
1	431
1-2	862
1-3	1293
1-4	1724
1-5	2155
1-6	2586
1-7	3017
1-8	3448
1-9	3879
1-10	4310
1-11	4737
1-12	5168

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual operating hours limitation shall be based upon a rolling, 12-month summation of the operating hours.

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III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit, R036:
 - a. the company identification for each coating employed;
 - b. documentation of whether or not each coating employed is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5);
 - c. the number of gallons of each coating employed (gallons/month);
 - d. the organic compound content for each coating employed, in pounds per gallon;
 - e. the organic compound emissions from each coating employed, in lbs/month ("c" times "d");
 - f. the total organic compound emissions from all coating materials employed (sum of "e" for all coatings);
 - g. beginning the first month after the first 12 calendar months of operation (following the issuance of this permit) the rolling, 12- month summation of the emission rate for OC, in tons;
 - h. the total number of hours the emissions unit was in operation;
 - i. during the first 12 calendar months of operation, (following the issuance of this permit) the cumulative hours of operation; and
 - j. beginning the first month after the first 12 calendar months of operation (following the issuance of this permit), the rolling 12 month summation of the hours of operation.
2. The permittee shall collect and record the following information each month for cleanup material usage in emissions unit R036:
 - a. the company identification of each cleanup material employed;
 - b. documentation of whether or not each cleanup material employed is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5);
 - c. documentation of whether or not each cleanup material employed is a volatile organic

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compound as defined in OAC rule 3745-21-01(B)(6) and 40 CFR 51.100(s);

- d. the number of gallons of each cleanup material employed (gallons/month);
 - e. the organic compound content for each cleanup material employed, in pounds per gallon;
 - f. the organic compound emissions from each cleanup material employed, in lbs/month ("d" times "e"); and
 - g. the total organic compound emission rate for all cleanup materials employed (sum of "f" for all cleanup materials).
3. At the end of each year the permittee shall collect and record the following information for annual emissions reporting and demonstration of compliance with the ton per year limits:
 - a. the annual organic compound emissions from all coatings employed and recorded in Section A.III.1 above, the sum of each calendar month from January through December; and
 - b. the annual organic compound emissions from all cleanup materials employed and recorded in Section A.III.2 above, the sum of each calendar month from January through December.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA Northwest District Office) in writing of any monthly record showing the use of photochemically reactive materials for coating operations. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northwest District Office) within 30 days following the end of calendar month.
2. The permittee shall submit quarterly deviation (excursion) reports which identify the following exceedances:
 - a. the rolling, 12-month hours of operation limitation;
 - b. the rolling, 12-month OC emissions limitation; and
 - c. for the first 12 calendar months of operation (following the issuance of this permit) all exceedances of the maximum allowable cumulative hours of operation.

These deviation (excursion) reports shall be submitted in accordance with the general terms and conditions of this permit.

3. The permittee shall notify the Director (the Ohio EPA Northwest District Office) in writing of any monthly record showing the use of a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northwest District Office) within 30 days following

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the end of the calendar month.

4. The permittee shall notify the Director (the Ohio EPA Northwest District Office) in writing of any monthly record showing the use of a volatile organic compound, as defined in OAC rule 3745-21-01(B)(6) and/or 40 CFR 51.100(s), for cleanup operations. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northwest District Office) within 30 days following the end of the calendar month.

V. Testing Requirements

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

- a. **Emission Limitation:**

16.0 lbs OC/hr and 41.34 tons OC per rolling 12-month period from coating operations

Applicable Compliance Method:

The hourly emission limitation represents the potential to emit* for this emissions unit. Therefore no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit for this emissions unit is based on a maximum usage rate of 2.34 gallons of coating per hour and a maximum OC content of 6.83 pounds per gallon

Compliance with the OC per rolling 12-month period shall be demonstrated by the recordkeeping requirements in Section A.III.1.

- b. **Emission Limitation**

99.0 lbs OC/month from cleanup operations

Applicable Compliance Method

Compliance shall be determined based upon the recordkeeping requirements specified in Section A.III.2.

- c. **Emission Limitation**

0.59 tons OC/yr from cleanup operations

Applicable Compliance Method

Compliance shall be determined based upon the recordkeeping requirements specified in Section A.III.2.

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d. **Emission Limitation**

The maximum annual hours of operation shall not exceed 5,168 hours per year, based upon a rolling 12-month summation of the operation hours

Applicable Compliance Method

Compliance shall be determined based upon the recordkeeping requirements specified in Section A.III.1.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

VI. Miscellaneous Requirements

None

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B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
10-inch Lacquer Line- #2 (Modification of PTI 03-13587 issued on 3/13/01 to establish synthetic minor limitations)	None	None

2. Additional Terms and Conditions

- 2.a Upon the permittee's demonstration of compliance with the final National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products, 40 CFR 63 Subpart PPPP, the following Air Toxic Policy shall no longer apply.

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit (R036) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

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Pollutant: Acetone

TLV (mg/m3): 1187

Maximum Hourly Emission Rate (lbs/hr): 3.36

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 781.4

MAGLC (ug/m3): 28,261

Pollutant: N-Butyl Acetate

TLV (mg/m3): 7126

Maximum Hourly Emission Rate (lbs/hr): 8

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 1875

MAGLC (ug/m3): 16,966

Pollutant: Cyclohexanone

TLV (mg/m3): 9629

Maximum Hourly Emission Rate (lbs/hr): 0.85

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 199.3

MAGLC (ug/m3): 22,926

Pollutant: Ethyl Acetate

TLV (mg/m3): 1441

Maximum Hourly Emission Rate (lbs/hr): 2.46

Predicted 1-Hour Maximum Ground-Level

Issued: To be entered upon final issuance

Concentration (ug/m3): 574.4

MAGLC (ug/m3): 34,309

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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts 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

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

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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Emissions Unit ID: R037

Issued: To be entered upon final issuance

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R037 - 4-inch 360 Degree Play Ball Printer- #2 (Modification of PTI 03-13650 issued on 12/6/01 to establish synthetic minor limitations)	OAC rule 3745-31-05(A)(3)	1.0 lb organic compounds (OC)/hr, 4.38 tons OC/yr
	OAC rule 3745-21-07(G)(2)	1181.0 lbs organic compounds (OC)/month, 7.09 tons OC/yr from cleanup operations (see Sections A.I.2.b, A.II.1 and A.II.2.)
	40 CFR Part 63, Subpart PPPP	See Section A.I.2.a See Section A of Part II - FACILITY SPECIFIC TERMS AND CONDITIONS.

2. Additional Terms and Conditions

- 2.a The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.b The emission limitation for cleanup operations involves organic compounds which do not participate in atmospheric photochemical reactions (See Section A.II.2) and therefore, are not considered volatile organic compounds as defined in OAC rule 3745-21-01 and 40 CFR 51.100(s).

II. Operational Restrictions

Issued: To be entered upon final issuance

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), for cleanup operations in this emissions unit is prohibited.
2. The use of volatile organic compounds, as defined in OAC rule 3745-21-01(B)(6) and 40 CFR 51.100(s), for cleanup operations in this emissions unit is prohibited.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for coating usage in emissions unit R037:
 - a. the company identification for each coating employed;
 - b. the number of gallons of each coating employed (gallons/month);
 - c. the organic compound content for each coating employed, in pounds per gallon;
 - d. the organic compound emissions from each coating employed, in lbs/month ("b" x "c"); and
 - e. the total organic compound emissions from all coating materials employed, in lbs/month (sum of "d" for all coatings).
2. The permittee shall collect and record the following information each month for cleanup material usage in emissions unit R037:
 - a. the company identification of each cleanup material employed;
 - b. documentation of whether or not each cleanup material employed is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5);
 - c. documentation of whether or not each cleanup material employed is a volatile organic compound as defined in OAC rule 3745-21-01(B)(6) and 40 CFR 51.100(s);
 - d. the number of gallons of each cleanup material employed (gallons/month);
 - e. the organic compound content for each cleanup material employed, in pounds per gallon;
 - f. the organic compound emissions from each cleanup material employed, in lbs/month ("d" times "e"); and
 - g. the total organic compound emissions from all cleanup materials employed, in lbs/month

(sum of "f" for all coatings).

3. At the end of each year the permittee shall collect and record the following information for annual emissions reporting and demonstration of compliance with the ton per year limits:
 - a. the annual organic compound emissions from all coatings employed and recorded in Section A.III.1 above, the sum of each calendar month from January through December; and
 - b. the annual organic compound emissions from all cleanup materials employed and recorded in Section A.III.2 above, the sum of each calendar month from January through December.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA Northwest District Office) in writing of any monthly record showing the use of a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), for cleanup operations. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northwest District Office) within 30 days following the end of the calendar month.
2. The permittee shall notify the Director (the Ohio EPA Northwest District Office) in writing of any monthly record showing the use of a volatile organic compound, as defined in OAC rule 3745-21-01(B)(6) and/or 40 CFR 51.100(s), for cleanup operations. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northwest District Office) within 30 days following the end of the calendar month.

V. Testing Requirements

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

- a. **Emission Limitation:**
1.0 lb/hr OC emissions from coating operations

Applicable Compliance Method:

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

* The potential to emit for this emissions unit was based on a maximum usage rate of 0.16 gallons/hr, and a maximum OC content of 6.83 lbs/gal.

- b. **Emission Limitation:**
4.38 tons/yr OC emissions from coating operations

Applicable Compliance Method:

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Compliance shall be based upon the recordkeeping requirements specified in Section A.III.1.

- c. **Emission Limitation**
1181.0 lbs OC/month from cleanup operations

Applicable Compliance Method

Compliance shall be determined based upon the recordkeeping requirements specified in Section A.III.2.

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- d. **Emission Limitation**
7.09 tons OC/yr from cleanup operations

Applicable Compliance Method

Compliance shall be determined based upon the recordkeeping requirements specified in Section A.III.2.

- 2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

VI. Miscellaneous Requirements

None

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Emissions Unit ID: R037

Issued: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
4-inch 360 Degree Play Ball Printer- #2 (Modification of PTI 03-13650 issued on 12/6/01 to establish synthetic minor limitations)	None	None

2. Additional Terms and Conditions

- 2.a Upon the permittee's demonstration of compliance with the final National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products, 40 CFR 63 Subpart PPPP, the following Air Toxic Policy shall no longer apply.

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit (R036) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Acetone

TLV (mg/m3): 1187

Maximum Hourly Emission Rate (lbs/hr): 39

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 1728

MAGLC (ug/m3): 28,261

Pollutant: Cyclohexanone

TLV (mg/m3): 9629

Maximum Hourly Emission Rate (lbs/hr): 6

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 29.27

MAGLC (ug/m3): 22,926

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

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

The permittee shall collect, record, and retain the following information when it conducts 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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R038 - 4-inch Lacquer Line with dry filtration (Modification of PTI 03-13650 issued on 12/6/01 to establish synthetic minor limitations)	OAC rule 3745-31-05(A)(3)	3.69 lbs organic compounds (OC)/hr, 16.16 tons OC/yr
	OAC rule 3745-21-07(G)(2)	66.0 lbs organic compounds OC/month, 0.40 tons OC/yr from cleanup operations (see Sections A.I.2.c, A.II.1 and A.II.2.)
	OAC rule 3745-17-11(A)	See Section A.II.1.
	OAC rule 3745-17-07(A)	See Section A.I.2.a.
	40 CFR Part 63, Subpart PPPP	See Section A.I.2.b.
		See Section A of Part II - FACILITY SPECIFIC TERMS AND CONDITIONS.

2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), this unit is exempt from the requirements of OAC rule 3745-17-11(B)(2).
- 2.b This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because OAC rule 3745-17-11 is not applicable.
- 2.c The emission limitation for cleanup operations involves organic compounds which do not participate in atmospheric photochemical reactions (See Section A.II.2) and therefore, are not considered volatile organic compounds as defined in OAC rule 3745-21-01 and 40 CFR 51.100(s).

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II. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.
2. The use of volatile organic compounds, as defined in OAC rule 3745-21-01(B)(6) and 40 CFR 51.100(s), for cleanup operations in this emissions unit is prohibited.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for coating usage in emissions unit R038:
 - a. the company identification for each coating employed;
 - b. the number of gallons of each coating employed (gallons/month);
 - c. the organic compound content for each coating employed, in pounds per gallon;
 - d. the organic compound emissions from each coating employed, in lbs/month ("b" times "c"); and
 - e. the total organic compound emissions from all coating materials employed, in lbs/month (sum of "d" for all coatings).
2. The permittee shall collect and record the following information each month for cleanup material usage in emissions unit R038:
 - a. the company identification of each cleanup material employed;
 - b. documentation of whether or not each cleanup material employed is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5);
 - c. documentation of whether or not each cleanup material employed is a volatile organic compound as defined in OAC rule 3745-21-01(B)(6) and 40 CFR 51.100(s);
 - d. the number of gallons of each cleanup material employed (gallons/month);
 - e. the organic compound content for each cleanup material employed, in pounds per gallon;

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- f. the organic compound emissions from each cleanup material employed, in lbs/month ("d" x "e"); and
 - g. the total organic compound emissions from all cleanup materials employed, in lbs/month (sum of "f" for all cleanup materials).
3. At the end of each year the permittee shall collect and record the following information for annual emissions reporting and demonstration of compliance with the ton per year limits:
 - a. the annual organic compound emissions from all coatings employed and recorded in Section A.III.1 above, the sum of each calendar month from January through December; and
 - b. the annual organic compound emissions from all cleanup materials employed and recorded in Section A.III.2 above, the sum of each calendar month from January through December.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA Northwest District Office) in writing of any monthly record showing the use of a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northwest District Office) within 30 days following the end of the calendar month.
2. The permittee shall notify the Director (the Ohio EPA Northwest District Office) in writing of any monthly record showing the use of a volatile organic compound, as defined in OAC rule 3745-21-01(B)(6) and/or 40 CFR 51.100(s), for cleanup operations. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northwest District Office) within 30 days following the end of the calendar month.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):
 - a. **Emission Limitation:**
3.69 lb/hr OC emissions from coating operations

Applicable Compliance Method:

The hourly OC emission limitation is based on the emission units potential to emit*.

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Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

- * The potential to emit for this emissions unit was based on a maximum usage rate of 0.54 gallons/hr, and a maximum OC content of 6.83 lbs/gal.

Emission Limitation:

16.16 tons/yr OC emissions from coating operations

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in Section A.III.1.

d. **Emission Limitation**

66.0 lbs OC/month from cleanup operations

Applicable Compliance Method

Compliance shall be determined based upon the recordkeeping requirements specified in Section A.III.2.

Emission Limitation

0.40 tons OC/yr from cleanup operations

Applicable Compliance Method

Compliance shall be determined based upon the recordkeeping requirements specified in Section A.III.2.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

VI. Miscellaneous Requirements

None

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B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
4-inch Lacquer Line with dry filtration (Modification of PTI 03-13650 issued on 12/6/01 to establish synthetic minor limitations)	None	None

2. Additional Terms and Conditions

- 2.a Upon the permittee's demonstration of compliance with the final National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products, 40 CFR 63 Subpart PPPP, the following Air Toxic Policy shall no longer apply.

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

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Emissions Unit ID: R038

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Emissions Unit ID: R038

Issued: To be entered upon final issuance**VI. Miscellaneous Requirements**

Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R039 - 6-inch Lacquer Line with dry filtration (Modification of PTI 03-13761 issued on 3/26/02 to establish synthetic minor limitations)	OAC rule 3745-31-05(A)(3)	4.64 lbs organic compounds (OC)/hr, 20.32 tons OC/yr
	OAC rule 3745-21-07(G)(2)	66.0 lbs organic compounds (OC)/month, 0.40 tons OC/yr from cleanup operations (see Sections A.I.2.c, A.II.1 and A.II.2.)
	OAC rule 3745-17-11(A)	See Section A.II.1.
	OAC rule 3745-17-07(A)	See Section A.I.2.a.
	40 CFR Part 63, Subpart PPPP	See Section A.I.2.b.
		See Section A of Part II - FACILITY SPECIFIC TERMS AND CONDITIONS.

2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), this unit is exempt from the requirements of OAC rule 3745-17-11(B)(2).
- 2.b This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because OAC rule 3745-17-11 is not applicable.
- 2.c The emission limitation for cleanup operations involves organic compounds which do not participate in atmospheric photochemical reactions (See Section A.II.2) and therefore, are not considered volatile organic compounds as defined in OAC rule 3745-21-01 and 40 CFR 51.100(s).

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II. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.
2. The use of volatile organic compounds, as defined in OAC rule 3745-21-01(B)(6) and 40 CFR 51.100(s), for cleanup operations in this emissions unit is prohibited.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for coating usage in emissions unit R039:
 - a. the company identification for each coating employed;
 - b. the number of gallons of each coating employed (gallons/month);
 - c. the organic compound content for each coating employed, in pounds per gallon;
 - d. the organic compound emissions from each coating employed, in lbs/month ("b" times "c"); and
 - e. the total organic compound emissions from all coating materials employed, in lbs/month (sum of "d" for all materials).
2. The permittee shall collect and record the following information each month for cleanup material usage in emissions unit R039:
 - a. the company identification of each cleanup material employed;
 - b. documentation of whether or not each cleanup material employed is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5);
 - c. documentation of whether or not each cleanup material employed is a volatile organic compound as defined in OAC rule 3745-21-01(B)(6) and 40 CFR 51.100(s);
 - d. the number of gallons of each cleanup material employed (gallons/month);
 - e. the organic compound content for each cleanup material employed, in pounds per gallon;

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- f. the organic compound emissions from each cleanup material employed, in lbs/month ("d" x "e"); and
 - g. the total organic compound emissions from all cleanup materials employed, in lbs/month (sum of "f" for all cleanup materials).
3. At the end of each year the permittee shall collect and record the following information for annual emissions reporting and demonstration of compliance with the ton per year limits:
 - a. the annual organic compound emissions from all coatings employed and recorded in Section A.III.1 above, the sum of each calendar month from January through December; and
 - b. the annual organic compound emissions from all cleanup materials employed and recorded in Section A.III.2 above, the sum of each calendar month from January through December.

IV. Reporting Requirements

2. The permittee shall notify the Director (the Ohio EPA Northwest District Office) in writing of any monthly record showing the use of a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northwest District Office) within 30 days following the end of the calendar month.
3. The permittee shall notify the Director (the Ohio EPA Northwest District Office) in writing of any monthly record showing the use of a volatile organic compound, as defined in OAC rule 3745-21-01(B)(6) and/or 40 CFR 51.100(s), for cleanup operations. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northwest District Office) within 30 days following the end of the calendar month.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):
 - a. **Emission Limitation:**
4.64 lb/hr OC emissions from coating operations

Applicable Compliance Method:

The hourly OC emission limitation is based on the emission units potential to emit*.

Emissions Unit ID: R039

Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

* The potential to emit for this emissions unit was based on a maximum usage rate of 0.68 gallons/hr, and a maximum OC content of 6.83 lbs/gal.

Emission Limitation:

20.32 tons/yr OC emissions from coating operations

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in Section A.III.1.

d. **Emission Limitation**

66.0 lbs OC/month from cleanup operations

Applicable Compliance Method

Compliance shall be determined based upon the recordkeeping requirements specified in Section A.III.2.

Emission Limitation

0.40 tons OC/yr from cleanup operations

Applicable Compliance Method

Compliance shall be determined based upon the recordkeeping requirements specified in Section A.III.2.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

VI. Miscellaneous Requirements

None

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B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
6-inch Lacquer Line with dry filtration (Modification of PTI 03-13761 issued on 3/26/02 to establish synthetic minor limitations)	None	None

2. Additional Terms and Conditions

- 2.a Upon the permittee's demonstration of compliance with the final National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products, 40 CFR 63 Subpart PPPP, the following Air Toxic Policy shall no longer apply.

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

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Issued: To be entered upon final issuance**VI. Miscellaneous Requirements**

Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R040 - 9.5-inch Tampo Printer- #1 (Modification of existing emissions unit to establish synthetic minor limitations)	OAC rule 3745-31-03(A)(3)	Emissions of organic compounds (OC) shall not exceed 8 pounds/hour and 40 pounds/day from coating operations 7.30 tons organic compounds (OC)/yr from coating operations 1181.0 lbs organic compounds(OC)/month, 7.09 tons OC/yr from cleanup operations (see Sections A.I.2.c, A.II.1 and A.II.2.)
	OAC rule 3745-31-05(C)	See Section A.I.2.b.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3), see Section A.2.a
	40 CFR Part 63, Subpart PPPP	See Section A of Part II - FACILITY SPECIFIC TERMS AND CONDITIONS.

2. Additional Terms and Conditions

- 2.a The requirements of OAC rule 3745-31-05(A)(3) that emissions of organic compounds (OC) shall not exceed 8 pounds/hour and 40 pounds/day applies on all days even when only non-photochemically reactive materials are used. Photochemically reactive materials is defined in OAC rule 3745-21-01(C)(5).
- 2.b This permit establishes federally enforceable limitations on emissions of organic

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compounds (OC) for the purpose of limiting the potential to emit to avoid applicability of the Prevention of Significant Deterioration (PSD) rules. This limitation shall be established through OAC rule 3745-31-05(A)(3), by limiting each emissions unit to no more than 40 pounds of OCs per day. For purposes of federal enforceability a limitation on OCs effectively restricts VOCs.

- 2.c** The emission limitation for cleanup operations involves organic compounds which do not participate in atmospheric photochemical reactions (See Section A.II.2) and therefore, are not considered volatile organic compounds as defined in OAC rule 3745-21-01 and 40 CFR 51.100(s).

II. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), for cleanup operations in this emissions unit is prohibited.
2. The use of volatile organic compounds, as defined in OAC rule 3745-21-01(B)(6) and 40 CFR 51.100(s), for cleanup operations in this emissions unit is prohibited.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for coating usage in emissions unit R040:
 - a. the company identification for each coating employed;
 - b. the number of gallons of each coating employed (gallons/day);
 - c. the organic compound content for each coating employed, in pounds per gallon;
 - d. the organic compound emissions from each coating employed, in lbs/day ("b" times "c");
 - e. the total organic compound emissions from all coating materials employed, in lbs/day (sum of "d" for all coatings);
 - f. the total number of hours the emissions unit was in operation; and
 - g. the OC emission rate, as an hourly average, in pounds ("e" divided by "f").
2. The permittee shall collect and record the following information each month for cleanup material usage in emissions unit R040:

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- a. the company identification of each cleanup material employed;
 - b. documentation of whether or not each cleanup material employed is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5);
 - c. documentation of whether or not each cleanup material employed is a volatile organic compound as defined in OAC rule 3745-21-01(B)(6) and 40 CFR 51.100(s);
 - d. the number of gallons of each cleanup material employed (gallons/month);
 - e. the organic compound content for each cleanup material employed , in pounds per gallon;
 - f. the organic compound emissions from each cleanup material employed, in lbs/month ("d" times "e"); and
 - g. the total organic compound emissions from all cleanup materials employed, in lbs/month (sum of "f" for all cleanup materials).
3. At the end of each year the permittee shall collect and record the following information for annual emissions reporting and demonstration of compliance with the ton per year limits:
- a. the annual organic compound emissions from all coatings employed and recorded in Section A.III.1 above, the sum of each calendar day from January 1 to December 31; and
 - b. the annual organic compound emissions from all cleanup materials employed and recorded in Section A.III.2 above, the sum of each calendar month from January through December.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which include the following information:
 - a. an identification of each day during which the average hourly organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. an identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual organic emissions for each such day.
2. The permittee shall notify the Director (the Ohio EPA Northwest District Office) in writing of any

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monthly record showing the use of a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), for cleanup operations. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northwest District Office) within 30 days following the end of the calendar month.

3. The permittee shall notify the Director (the Ohio EPA Northwest District Office) in writing of any monthly record showing the use of a volatile organic compound, as defined in OAC rule 3745-21-01(B)(6) and/or 40 CFR 51.100(s), for cleanup operations. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northwest District Office) within 30 days following the end of the calendar month.

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1. Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):
 - a. **Emission Limitation**
8 pounds/hour of OC emissions from coating operations

Applicable Compliance Method
Compliance with hourly organic compound emission limit shall be based upon the record keeping requirements contained in Section A.III.1 of this permit.
 - b. **Emission Limitation**
40 pounds/day of OC emissions from coating operations

Applicable Compliance Method
Compliance with daily organic compound emission limit shall be based upon the record keeping requirements contained in Section A.III.1 of this permit.
 - c. **Emission Limitation**
7.30 tons/year of OC emissions from coating operations

Applicable Compliance Method
Compliance shall be determined based upon the recordkeeping requirements specified in Section A.III.1.
 - d. **Emission Limitation**
1181.0 lbs OC/month from cleanup operations

Applicable Compliance Method
Compliance shall be determined based upon the recordkeeping requirements specified in Section A.III.2.

Emission Limitation
7.09 tons OC/yr from cleanup operations

Applicable Compliance Method
Compliance shall be determined based upon the recordkeeping requirements specified in Section A.III.2.
2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings

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and cleanup materials.

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VI. Miscellaneous Requirements

None

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B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
9.5-inch Tampo Printer- #1 (Modification of existing emissions unit to establish synthetic minor limitations)	None	None

2. Additional Terms and Conditions

- 2.a Upon the permittee's demonstration of compliance with the final National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products, 40 CFR 63 Subpart PPPP, the following Air Toxic Policy shall no longer apply.

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

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Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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Emissions Unit ID: R041

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R041 - 9.5-inch Tampo Printer- #2 (Modification of existing emissions unit to establish synthetic minor limitations)	OAC rule 3745-31-03(A)(3)	Emissions of organic compounds (OC) shall not exceed 8 pounds/hour and 40 pounds/day from coating operations 7.30 tons organic compounds (OC)/yr from coating operations 1181.0 lbs organic compounds (OC)/month, 7.09 tons OC/yr from cleanup operations (see Sections A.I.2.c, A.II.1 and A.II.2.)
	OAC rule 3745-31-05(C)	See Section A.I.2.b.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3), see Section A.I.2.a
	40 CFR Part 63, Subpart PPPP	See Section A of Part II - FACILITY SPECIFIC TERMS AND CONDITIONS.

2. Additional Terms and Conditions

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- 2.a** The requirements of OAC rule 3745-31-05(A)(3) that emissions of organic compounds (OC) shall not exceed 8 pounds/hour and 40 pounds/day applies on all days even when only non-photochemically reactive materials are used. Photochemically reactive materials is defined in OAC rule 3745-21-01(C)(5).
- 2.b** This permit establishes federally enforceable limitations on emissions of organic compounds (OC) for the purpose of limiting the potential to emit to avoid applicability of the Prevention of Significant Deterioration (PSD) rules. This limitation shall be established through OAC rule 3745-31-05(A)(3), by limiting each emissions unit to no more than 40 pounds of OCs per day. For purposes of federal enforceability a limitation on OCs effectively restricts VOCs.
- 2.c** The emission limitation for cleanup operations involves organic compounds which do not participate in atmospheric photochemical reactions (See Section A.II.2) and therefore, are not considered volatile organic compounds as defined in OAC rule 3745-21-01 and 40 CFR 51.100(s).

II. Operational Restrictions

- 1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), for cleanup operations in this emissions unit is prohibited.
- 2. The use of volatile organic compounds, as defined in OAC rule 3745-21-01(B)(6) and 40 CFR 51.100(s), for cleanup operations in this emissions unit is prohibited.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall collect and record the following information each day for coating usage in emissions unit R041:
 - a. the company identification for each coating employed;
 - b. the number of gallons of each coating employed (gallons/day);
 - c. the organic compound content for each coating employed, in pounds per gallon;
 - d. the organic compound emissions from each coating employed, in lbs/day ("b" times "c");
 - e. the total organic compound emissions from all coating materials employed, in lbs/day (sum of "d" for all coatings);

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- f. the total number of hours the emissions unit was in operation; and
 - g. the OC emission rate, as an hourly average, in pounds ("e" divided by "f").
2. The permittee shall collect and record the following information each month for cleanup material usage in emissions unit R041:
 - a. the company identification of each cleanup material employed;
 - b. documentation of whether or not each cleanup material employed is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5);
 - c. documentation of whether or not each cleanup material employed is a volatile organic compound as defined in OAC rule 3745-21-01(B)(6) and 40 CFR 51.100(s);
 - d. the number of gallons of each cleanup material employed (gallons/month);
 - e. the organic compound content for each cleanup material employed , in pounds per gallon;
 - f. the organic compound emissions from each cleanup material employed, in lbs/month ("d" times "e"); and
 - g. the total organic compound emissions from all cleanup materials employed, in lbs/month (sum of "f" for all cleanup materials).
3. At the end of each year the permittee shall collect and record the following information for annual emissions reporting and demonstration of compliance with the ton per year limits:
 - a. the annual organic compound emissions from all coatings employed and recorded in Section A.III.1 above, the sum of each calendar day from January 1 to December 31; and
 - b. the annual organic compound emissions from all cleanup materials employed and recorded in Section A.III.2 above, the sum of each calendar month from January through December.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which include the following information:
 - a. an identification of each day during which the average hourly organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. an identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual organic emissions for each such day.

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2. The permittee shall notify the Director (the Ohio EPA Northwest District Office) in writing of any monthly record showing the use of a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), for cleanup operations. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northwest District Office) within 30 days following the end of the calendar month.

3. The permittee shall notify the Director (the Ohio EPA Northwest District Office) in writing of any monthly record showing the use of a volatile organic compound, as defined in OAC rule 3745-21-01(B)(6) and/or 40 CFR 51.100(s), for cleanup operations. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northwest District Office) within 30 days following the end of the calendar month.

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1. Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):
 - a. **Emission Limitation**
8 pounds/hour of OC emissions from coating operations

Applicable Compliance Method
Compliance with hourly organic compound emission limit shall be based upon the record keeping requirements contained in Section A.III.1 of this permit.
 - b. **Emission Limitation**
40 pounds/day of OC emissions from coating operations

Applicable Compliance Method
Compliance with daily organic compound emission limit shall be based upon the record keeping requirements contained in Section A.III.1 of this permit.
 - c. **Emission Limitation**
7.30 tons/year of OC emissions from coating operations

Applicable Compliance Method
Compliance shall be determined based upon the recordkeeping requirements specified in Section A.III.1.
 - d. **Emission Limitation**
1181.0 lbs OC/month from cleanup operations

Applicable Compliance Method
Compliance shall be determined based upon the recordkeeping requirements specified in Section A.III.2.

Emission Limitation
7.09 tons OC/yr from cleanup operations

Applicable Compliance Method
Compliance shall be determined based upon the recordkeeping requirements specified in Section A.III.2.
2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings

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and cleanup materials.

VI. Miscellaneous Requirements

None

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B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
9.5-inch Tampo Printer- #2 (Modification of existing emissions unit to establish synthetic minor limitations)	None	None

2. Additional Terms and Conditions

- 2.a Upon the permittee's demonstration of compliance with the final National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products, 40 CFR 63 Subpart PPPP, the following Air Toxic Policy shall no longer apply.

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

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Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R042 - 9.5-inch Tampo Printer- #3 (Modification of existing emissions unit to establish synthetic minor limitations)	OAC rule 3745-31-03(A)(3)	Emissions of organic compounds (OC) shall not exceed 8 pounds/hour and 40 pounds/day from coating operations 7.30 tons organic compounds (OC)/yr from coating operations 1181.0 lbs organic compounds (OC)/month, 7.09 tons OC/yr from cleanup operations (see Sections A.I.2.c, A.II.1 and A.II.2.)
	OAC rule 3745-31-05(C)	See Section A.I.2.b.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3), see Section A.I.2.a
	40 CFR Part 63, Subpart PPPP	See Section A of Part II - FACILITY SPECIFIC TERMS AND CONDITIONS.

2. Additional Terms and Conditions

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- 2.a** The requirements of OAC rule 3745-31-05(A)(3) that emissions of organic compounds (OC) shall not exceed 8 pounds/hour and 40 pounds/day applies on all days even when only non-photochemically reactive materials are used. Photochemically reactive materials is defined in OAC rule 3745-21-01(C)(5).
- 2.b** This permit establishes federally enforceable limitations on emissions of organic compounds (OC) for the purpose of limiting the potential to emit to avoid applicability of the Prevention of Significant Deterioration (PSD) rules. This limitation shall be established through OAC rule 3745-31-05(A)(3), by limiting each emissions unit to no more than 40 pounds of OCs per day. For purposes of federal enforceability a limitation on OCs effectively restricts VOCs.
- 2.c** The emission limitation for cleanup operations involves organic compounds which do not participate in atmospheric photochemical reactions (See Section A.II.2) and therefore, are not considered volatile organic compounds as defined in OAC rule 3745-21-01 and 40 CFR 51.100(s).

II. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), for cleanup operations in this emissions unit is prohibited.
2. The use of volatile organic compounds, as defined in OAC rule 3745-21-01(B)(6) and 40 CFR 51.100(s), for cleanup operations in this emissions unit is prohibited.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for coating usage in emissions unit R042:
 - a. the company identification for each coating employed;
 - b. the number of gallons of each coating employed (gallons/day);
 - c. the organic compound content for each coating employed, in pounds per gallon;
 - d. the organic compound emissions from each coating employed, in lbs/day ("b" times "c");
 - e. the total organic compound emissions from all coating materials employed, in lbs/day (sum of "d" for all coatings);
 - f. the total number of hours the emissions unit was in operation; and
 - g. the OC emission rate, as an hourly average, in pounds ("e" divided by "f").
2. The permittee shall collect and record the following information each month for cleanup material

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usage in emissions unit R042:

- a. the company identification of each cleanup material employed;

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- b. documentation of whether or not each cleanup material employed is a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5);
 - c. documentation of whether or not each cleanup material employed is a volatile organic compound as defined in OAC rule 3745-21-01(B)(6) and 40 CFR 51.100(s);
 - d. the number of gallons of each cleanup material employed (gallons/month);
 - e. the organic compound content for each cleanup material employed , in pounds per gallon;
 - f. the organic compound emissions from each cleanup material employed, in lbs/month ("d" times "e"); and
 - g. the total organic compound emissions from all cleanup materials employed, in lbs/month (sum of "f" for all cleanup materials).
3. At the end of each year the permittee shall collect and record the following information for annual emissions reporting and demonstration of compliance with the ton per year limits:
 - a. the annual organic compound emissions from all coatings employed and recorded in Section A.III.1 above, the sum of each calendar day from January 1 to December 31; and
 - b. the annual organic compound emissions from all cleanup materials employed and recorded in Section A.III.2 above, the sum of each calendar month from January through December.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, which include the following information:
 - a. an identification of each day during which the average hourly organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. an identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual organic emissions for each such day.
2. The permittee shall notify the Director (the Ohio EPA Northwest District Office) in writing of any monthly record showing the use of a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), for cleanup operations. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northwest District Office) within 30 days following

the end of the calendar month.

3. The permittee shall notify the Director (the Ohio EPA Northwest District Office) in writing of any monthly record showing the use of a volatile organic compound, as defined in OAC rule 3745-21-01(B)(6) and/or 40 CFR 51.100(s), for cleanup operations. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Northwest District Office) within 30 days following the end of the calendar month.

V. Testing Requirements

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

- a. **Emission Limitation**

8 pounds/hour of OC emissions from coating operations

Applicable Compliance Method

Compliance with hourly organic compound emission limit shall be based upon the record keeping requirements contained in Section A.III.1 of this permit.

- b. **Emission Limitation**

40 pounds/day of OC emissions from coating operations

Applicable Compliance Method

Compliance with daily organic compound emission limit shall be based upon the record keeping requirements contained in Section A.III.1 of this permit.

- c. **Emission Limitation**

7.30 tons/year of OC emissions from coating operations

Applicable Compliance Method

Compliance shall be determined based upon the recordkeeping requirements specified in Section A.III.1.

- d. **Emission Limitation**

1181.0 lbs OC/month from cleanup operations

Applicable Compliance Method

Compliance shall be determined based upon the recordkeeping requirements specified in Section A.III.2.

Emission Limitation

7.09 tons OC/yr from cleanup operations

Applicable Compliance Method

Compliance shall be determined based upon the recordkeeping requirements specified in

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Section A.III.2.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

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VI. Miscellaneous Requirements

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None

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B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
9.5-inch Tampo Printer- #3 (Modification of existing emissions unit to establish synthetic minor limitations)	None	None

2. Additional Terms and Conditions

- 2.a Upon the permittee's demonstration of compliance with the final National Emission Standards for Hazardous Air Pollutants (NESHAP) for Surface Coating of Plastic Parts and Products, 40 CFR 63 Subpart PPPP, the following Air Toxic Policy shall no longer apply.

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

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Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.