



Environmental  
Protection Agency

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

6/7/2012

Mr. Matt Conner  
Parker Hannifin Corp., Parflex Division  
1300 N. Freedom Street  
Ravenna, OH 44266

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 1667060121  
Permit Number: P0109988  
Permit Type: Administrative Modification  
County: Portage

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at [www.epa.ohio.gov/dapc/permitsurvey.aspx](http://www.epa.ohio.gov/dapc/permitsurvey.aspx) and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact Akron Regional Air Quality Management District at (330)375-2480 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPCWeb page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc), by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: ARAQMD





**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
Parker Hannifin Corp., Parflex Division**

Facility ID:	1667060121
Permit Number:	P0109988
Permit Type:	Administrative Modification
Issued:	6/7/2012
Effective:	6/7/2012
Expiration:	1/14/2016





Division of Air Pollution Control
Permit-to-Install and Operate
for
Parker Hannifin Corp., Parflex Division

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## Authorization

Facility ID: 1667060121  
Application Number(s): M0001685  
Permit Number: P0109988  
Permit Description: Administrative modification of Permit to Install 16-02466 issued final on April 12, 2007 to allow the use of a new chemical in the Reinforcement Operations (R001) and the PreCoat Operations (R002).  
Permit Type: Administrative Modification  
Permit Fee: \$2,500.00  
Issue Date: 6/7/2012  
Effective Date: 6/7/2012  
Expiration Date: 1/14/2016  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Parker Hannifin Corp., Parflex Division  
1300 N. Freedom Street  
Ravenna, OH 44266

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

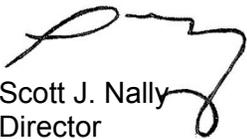
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Akron Regional Air Quality Management District  
146 South High Street, Room 904  
Akron, OH 44308  
(330)375-2480

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Scott J. Nally  
Director



## Authorization (continued)

Permit Number: P0109988

Permit Description: Administrative modification of Permit to Install 16-02466 issued final on April 12, 2007 to allow the use of a new chemical in the Reinforcement Operations (R001) and the PreCoat Operations (R002).

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

<b>Emissions Unit ID:</b>	<b>R001</b>
Company Equipment ID:	R001
Superseded Permit Number:	16-02466
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>R002</b>
Company Equipment ID:	R002
Superseded Permit Number:	16-02466
General Permit Category and Type:	Not Applicable

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

**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Akron Regional Air Quality Management District in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting<sup>1</sup> a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

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<sup>1</sup>Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

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

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.

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



1. R001, R001

Operations, Property and/or Equipment Description:

Process 03 - Reinforcement Operations (see Table 3. Process 03 - Reinforcement Operations Emissions Units)

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)c., d)(2), d)(3), d)(4), d)(5) and f)(1)f.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b., c)(1), c)(2), c)(3), d)(1), e)(1), f)(1)b., f)(1)c., f)(1)d., and f)(1)e.

b) Applicable Emissions Limitations and/or Control Requirements

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

Table with 2 columns: Applicable Rules/Requirements and Applicable Emissions Limitations/Control Measures. Row 'a.' contains OAC rule 3745-31-05(A)(3) and detailed emission limits for various applicators (BAA-003 to BAA-010, BEA-001 to BEA-004, BNYA-001).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>002, and BNYA-003 shall not exceed 2.04 pounds per hour.</p> <p>The emissions of organic compounds (OC)** from applicator BTA-001 shall not exceed 1.02 pounds per hour.</p> <p>The emissions of VOC* from each of the following applicators: BAA-001 and BAA-002 shall not exceed 0.27 pound per hour.</p> <p>The emissions of OC** from emissions units R001, R002, and R003, combined, shall not exceed 31.61 tons per year, based upon a rolling, 12-month summation of the monthly emissions.</p>
b.	<p>OAC rule 3745-31-05(D)          (Synthetic Minor to avoid Title V, nonattainment NSR and MACT requirements)</p>	<p>The emissions of VOC* from emissions units R001, R002, and R003, combined, shall not exceed 21.66 tons per year, based upon a rolling, 12-month summation of the monthly emissions.</p> <p>The VOC content of each chemical purchased*** shall not exceed 4.15 pounds of VOC per gallon of chemical 3, 7.05 pounds of VOC per gallon of chemical 4, 6.76 pounds of VOC per gallon of chemical 5, 6.77 pounds of VOC per gallon of chemical 8, 0.0 pound of VOC per gallon of chemical 10, 2.79 pounds of VOC per gallon of chemical 12, 3.31 pounds of VOC per gallon of chemical 13, 7.83 pounds of VOC per gallon of chemical 14, 7.93 pounds of VOC per gallon of chemical 15, and 2.10 pounds of VOC per gallon of chemical 16.</p> <p>See c)(1), c)(2), and c)(3) below.</p> <p>The emissions of any individual hazardous air pollutant (HAP) from the entire facility (i.e., emissions units R001, R002, R003, and OAC rule 3745-31-03 exempt and "de minimis" emissions units,</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>combined) shall not exceed 9.95 tons per year, based upon a rolling, 12-month summation of the monthly emissions.</p> <p>The emissions of total combined HAPs from the entire facility (i.e., emissions units R001, R002, R003, and OAC rule 3745-31-03 exempt and "de minimis" emissions units, combined) shall not exceed 24.9 tons per year, based upon a rolling, 12-month summation of the monthly emissions.</p> <p>*All OC emitted from applicators BAA-001, BAA-002, BAA-003, BAA-004, BAA-005, BAA-006, BAA-007, BAA-008, BAA-009, BAA-010, BEA-001, BEA-002, BEA-003, BEA-004, BNYA-001, BNYA-002, and BNYA-003 are considered to be VOC.</p> <p>**OC emitted from applicator BTA-001 are not considered to be VOC.</p> <p>***The pound(s) of VOC per gallon limitations are 2% higher than the VOC content supplied by the material manufacturer in order to account for inherent fluctuations in actual material formulation.</p>
c.	OAC rule 3745-21-28	<p>The facility is not subject to the requirements in paragraphs (B) to (G) of OAC rule 3745-21-28 because the total actual VOC emissions, before the application of air pollution control systems, from all miscellaneous industrial adhesive application processes (including emissions from surface preparation and cleanup activities) at the facility are not equal to or greater than 3.0 tons per twelve-month rolling period.</p>

(2) Additional Terms and Conditions

- a. The hourly VOC and OC emission limitations are based on each applicator's potential to emit. Therefore, no monitoring, record keeping or reporting is or will

be required to demonstrate compliance with these emission limitations. Such requirements would be impractical and unreasonable given the nature of this emissions unit.

- b. For all chemical usage limitations, monitoring, record keeping, and reporting requirements that deal with chemical usage in this permit, the total quantity of chemical used/employed in this emissions unit during any rolling 12-month period is considered to be equivalent to the total quantity of chemical purchased and received during that rolling 12-month period, except that any quantity of chemical that can be shown to have been returned, rejected, or disposed after having been received shall not be considered to have been used.

c) Operational Restrictions

- (1) The maximum annual chemical 5, chemical 8, chemical 10, chemical 12, chemical 13, chemical 14, and chemical 15 usage rates (for emissions units R001, R002, and R003, combined) shall not exceed 338 gallons, 1238 gallons, 4077 gallons, 1993 gallons, 745 gallons, 125 gallons, and 500 gallons, respectively, based upon rolling, 12-month summations of the monthly chemicals usage rates.
- (2) The maximum annual net chemical 3 and chemical 4 usage rates (for emissions units R001, R002, and R003, combined) shall not exceed 326 gallons and 2604 gallons, respectively, based upon rolling, 12-month summations of the net\* monthly chemicals usage rates.

\*The net chemicals usage rate is defined as the amount of chemicals used minus the amount of chemicals returned, rejected or disposed of as waste. In addition, it is assumed that the amount of chemicals purchased is equivalent to the amount of chemicals used/employed.

- (3) The maximum annual chemical 4 and chemical 16 combined usage rate (for emissions units R001, R002, and R003, combined) shall not exceed 2604 gallons based upon a rolling, 12-month summation of the monthly combined chemical usage rates.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information for emissions units R001, R002, and R003, combined:
  - a. the company identification of each chemical employed;
  - b. the VOC content of each chemical employed\*, in pounds of VOC per gallon of chemical;
  - c. the OC content of each chemical employed, in pounds of OC per gallon of chemical;
  - d. the individual HAP<sup>1</sup> content for each HAP of each chemical employed, in pounds of individual HAP per gallon of chemical;
  - e. the total number of gallons of each chemical employed;

- f. the total number of gallons of chemical 3 and chemical 4 returned, rejected, or disposed of as waste;
- g. the total number of gallons of chemical 4 and chemical 16 employed;
- h. the rolling, 12-month chemicals usage rates for each chemical\*\* and chemical 4 and chemical 16 combined, in gallons;
- i. the rolling, 12-month net chemicals usage rates for chemical 3 and chemical 4, in gallons;
- j. the amount of waste removed from the facility for emissions units R001, R002, and R003, combined, in pounds;
- k. the VOC content of the waste removed, in pounds of VOC per pound of waste;
- l. the OC content of the waste removed, in pounds of OC per pound of waste;
- m. the individual HAP content for each HAP of the waste removed, in pound of individual HAP per pound of waste;
- n. the VOC emissions, in tons (i.e., the sum of (b) times (e) for each chemical minus (j) times (k) for all waste removed, and then divide by 2000);
- o. the OC emissions, in tons (i.e., the sum of (c) times (e) for each chemical minus (j) times (l) for all waste removed, and then divide by 2000);
- p. the total individual HAP emissions for each HAP from all the chemicals employed, in tons per month (i.e., for each HAP the sum of (d) times (e) for each chemical minus (j) times (m) for all waste removed plus (x)\*\*\*/12, and then divide by 2000);
- q. the total combined HAPs emissions from all the chemicals employed, in tons per month (i.e., the sum of the total individual HAP emissions in (p)); and
- r. the rolling, 12-month VOC, OC, each individual HAP, and total combined HAPs emissions, in tons.

<sup>1</sup>A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis.

\* The amount of chemicals purchased (excluding any chemicals returned or rejected during that period) is considered to be equal to the amount of chemicals employed/used.

\*\* This record does not need kept for chemical 3 and chemical 4.

\*\*\* "x" is the potential to emit of each individual HAP for all OAC rule 3745-31-03 exempt and "de minimis" emissions units in tons per year.

- (2) The permittee shall maintain monthly records of the following information for the miscellaneous industrial adhesive and sealant application process (including emissions from surface preparation and cleanup activities):
- Total pounds or gallons of each adhesive, sealant, adhesive primer, sealant primer, cleanup solvent and surface preparation solvent used per calendar month;
  - VOC content (per cent by weight and pounds per gallon) of each adhesive, sealant, adhesive primer, sealant primer, cleanup solvent and surface preparation solvent used per calendar month;
  - The total monthly VOC emissions, before the application of capture systems and control devices, in pounds for all adhesives, sealant, adhesive primer, sealant primer, cleanup solvent and surface preparation solvent employed per calendar month; and
  - The rolling twelve-month summation of VOC emissions, in tons, before the application of control systems and devices. The rolling twelve-month summation shall be calculated as the total VOC emissions for the current calendar month, plus the total VOC emissions from the previous eleven calendar months.

These records shall be retained for a period of five years.

- (3) The permit to install (PTI)16-02466 for this emissions unit R001 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the PTI application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant listed in OAC rule 3745-114-01, using data from the PTI application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: methylene chloride

TLV (mg/m<sup>3</sup>): 173.61

Maximum Hourly Emission Rate (lbs/hr): 20.22\*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 2910.0

MAGLC (ug/m<sup>3</sup>): 4133.6

Pollutant: trichloroethylene

TLV (mg/m<sup>3</sup>): 268.6

Maximum Hourly Emission Rate (lbs/hr): 7.1

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 2069.2

MAGLC (ug/m<sup>3</sup>): 6395.3

\*Combined emission rate for R001 and R002.

- (4) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - 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.).
- (5) 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing federally enforceable permit to install and operate (FEPTIO) will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final FEPTIO 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 the 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.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
    - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
      - i. the rolling, 12-month chemicals usage rate limitations as specified in c)(1) and c)(3) above;
      - ii. the rolling, 12-month net chemicals usage rate limitations as specified in section c)(2) above;
      - iii. the rolling, 12-month emission limitations for VOC and OC of 21.66 tons and 31.61 tons, respectively (for emissions units R001, R002, and R003, combined);
      - iv. the rolling, 12-month emission limitations for any individual HAP and total combined HAPs of 9.95 tons and 24.9 tons, respectively (from the entire facility);
    - b. the probable cause of each deviation (excursion);
    - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
    - d. the magnitude and duration of each deviation (excursion).

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

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

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

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

- a. Emission Limitations:

The emissions of VOC from each of the following applicators: BAA-003, BAA-004, BAA-005, BAA-006, BAA-007, BAA-008, BAA-009, and BAA-010 shall not exceed 0.82 pound per hour.

The emissions of VOC from each of the following applicators: BEA-001, BEA-002, and BEA-003 shall not exceed 0.53 pound per hour.

The emissions of VOC from applicator BEA-004 shall not exceed 1.51 pounds per hour.

The emissions of VOC from each of the following applicators: BNYA-001, BNYA-002, and BNYA-003 shall not exceed 2.04 pounds per hour.

The emissions of OC from applicator BTA-001 shall not exceed 1.02 pounds per hour.

The emissions of VOC from each of the following applicators: BAA-001 and BAA-002 shall not exceed 0.27 pound per hour.

Applicable Compliance Method:

Compliance with the hourly allowable VOC or OC emission limitations above shall be demonstrated by multiplying worst-case VOC or OC content (in pounds per gallon) by the maximum hourly usage rate (in gallons).

If required and technically feasible, the permittee shall demonstrate compliance with the hourly allowable VOC and OC emission limitations based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- b. Emission Limitations:

The emissions of OC from emissions units R001, R002, and R003, combined, shall not exceed 31.61 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

The emissions of VOC from emissions units R001, R002, and R003, combined, shall not exceed 21.66 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the annual allowable VOC and OC emission limitations above shall be demonstrated through the record keeping requirements established in d)(1) above.

c. Emission Limitations:

The VOC content of each chemical purchased shall not exceed 4.15 pounds of VOC per gallon of chemical 3, 7.05 pounds of VOC per gallon of chemical 4, 6.76 pounds of VOC per gallon of chemical 5, 6.77 pounds of VOC per gallon of chemical 8, 0.0 pound of VOC per gallon of chemical 10, 2.79 pounds of VOC per gallon of chemical 12, 3.31 pounds of VOC per gallon of chemical 13, 7.83 pounds of VOC per gallon of chemical 14, 7.93 pounds of VOC per gallon of chemical 15, and 2.10 pounds of VOC per gallon of chemical 16.

Applicable Compliance Method:

Compliance with the allowable VOC content limitations above shall be demonstrated through the record keeping requirements established in d)(1) above.

Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the VOC contents of each chemical.

d. Emission Limitations:

The emissions of any individual HAP from the entire facility shall not exceed 9.95 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

The emissions of the total combined HAPs from the entire facility shall not exceed 24.9 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the annual allowable HAP emission limitations above shall be demonstrated through the record keeping requirements established in d)(1) above.

e. Usage Limitations:

The maximum annual chemical 5, chemical 8, chemical 10, chemical 12, chemical 13, chemical 14, and chemical 15 usage rates (for emissions units R001, R002, and R003, combined) shall not exceed 338 gallons, 1238 gallons,

4077 gallons, 1993 gallons, 745 gallons, 125 gallons, and 500 gallons, respectively, based upon rolling, 12-month summations of the monthly chemicals usage rates.

The maximum annual net chemical 3 and chemical 4 usage rates (for emissions units R001, R002, and R003, combined) shall not exceed 326 gallons and 2604 gallons, respectively, based upon rolling, 12-month summations of the net\* monthly chemicals usage rates.

The maximum annual chemical 4 and chemical 16 combined usage rate (for emissions units R001, R002, and R003, combined) shall not exceed 2604 gallons based upon a rolling, 12-month summation of the monthly combined chemical usage rates.

Applicable Compliance Method:

Compliance with the annual allowable chemicals usage rate limitations and the annual allowable net chemicals usage rate limitations above shall be demonstrated through the record keeping requirements established in d)(1) above.

f. Emission Limitation:

The total actual VOC emissions, before the application of air pollution control systems, from all miscellaneous industrial adhesive application processes (including emissions from surface preparation and cleanup activities) at the facility are not equal to or greater than 3.0 tons per twelve-month rolling period.

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be demonstrated through the record keeping requirements established in d)(2) above.

g) Miscellaneous Requirements

(1) Table 3. Process 03 - Reinforcement Operations Emissions Units

Applicator Number	Date of Installation	Maximum Material Usage Rate (gallon/hour)
BAA-003	2002	0.121
BAA-004	2002	0.121
BAA-005	2002	0.121
BAA-006	2002	0.121
BAA-007	2005	0.121



BAA-008	2005	0.121
BAA-009	2005	0.121
BAA-010	2005	0.121
BEA-001	1978	0.145
BEA-002	1979	0.145
BEA-003	1982	0.145
BEA-004	2002	0.417
BNYA-001	2002	0.73
BNYA-002	2002	0.73
BNYA-003	2002	0.73
BTA-001	2002	0.206
BAA-001	2002	0.041
BAA-001	2002	0.041

**2. R002, R002**

**Operations, Property and/or Equipment Description:**

Process 04 - PreCoat Operations (see Table 4. Process 04 - PreCoat Operations Emissions Units)

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)c., d)(2), d)(3), d)(4), d)(5) and f)(1)f.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b., c)(1), c)(2), c)(3), d)(1), e)(1), and f)(1)b., f)(1)c., f)(1)d., and f)(1)e.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>The emissions of organic compounds (OC)** from each of the following applicators: PTA-001 and PTA-002 shall not exceed 3.95 pounds per hour.</p> <p>The emissions of OC** from each of the following applicators: PTA-003 and PTA-004 shall not exceed 3.90 pounds per hour.</p> <p>The emissions of OC** from applicator PTA-005 shall not exceed 3.58 pounds per hour.</p> <p>The emissions of volatile organic compounds (VOC)* from applicator PNYA-001 shall not exceed 2.42 pounds per hour.</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>The emissions of VOC* from applicator PEA-001 shall not exceed 1.36 pounds per hour.</p> <p>The emissions of OC** from emissions units R001, R002, and R003, combined, shall not exceed 31.61 tons per year, based upon a rolling, 12-month summation of the monthly emissions.</p>
b.	<p>OAC rule 3745-31-05(D)  (Synthetic Minor to avoid Title V, nonattainment NSR and MACT requirements)</p>	<p>The emissions of VOC* from emissions units R001, R002, and R003, combined, shall not exceed 21.66 tons per year, based upon a rolling, 12-month summation of the monthly emissions.</p> <p>The VOC content of each chemical purchased*** shall not exceed 4.15 pounds of VOC per gallon of chemical 3, 7.05 pounds of VOC per gallon of chemical 4, 6.76 pounds of VOC per gallon of chemical 5, 6.77 pounds of VOC per gallon of chemical 8, 0.0 pound of VOC per gallon of chemical 10, 2.79 pounds of VOC per gallon of chemical 12, 3.31 pounds of VOC per gallon of chemical 13, 7.83 pounds of VOC per gallon of chemical 14, 7.93 pounds of VOC per gallon of chemical 15, and 2.10 pounds of VOC per gallon of chemical 16.</p> <p>See c)(1), c)(2), and c)(3) below.</p> <p>The emissions of any individual hazardous air pollutant (HAP) from the entire facility (i.e., emissions units R001, R002, R003, and OAC rule 3745-31-03 exempt and "de minimis" emissions units, combined) shall not exceed 9.95 tons per year, based upon a rolling, 12-month summation of the monthly emissions.</p> <p>The emissions of total combined HAPs from the entire facility (i.e., emissions units R001, R002, R003, and OAC rule 3745-31-03 exempt and "de minimis" emissions units, combined) shall not</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>exceed 24.9 tons per year, based upon a rolling, 12-month summation of the monthly emissions</p> <p>*All OC emitted from applicators PNYA-001 and PEA-001 are considered to be VOC.</p> <p>**OC emitted from applicators PTA-001, PTA-002, PTA-003, PTA-004, and PTA-005 are not considered to be VOC.</p> <p>***The pound(s) of VOC per gallon limitations are 2% higher than the VOC content supplied by the material manufacturer in order to account for inherent fluctuations in actual material formulation.</p>
c.	OAC rule 3745-21-28	<p>The facility is not subject to the requirements in paragraphs (B) to (G) of OAC rule 3745-21-28 because the total actual VOC emissions, before the application of air pollution control systems, from all miscellaneous industrial adhesive application processes (including emissions from surface preparation and cleanup activities) at the facility are not equal to or greater than 3.0 tons per twelve-month rolling period.</p>

(2) Additional Terms and Conditions

- a. The hourly VOC and OC emission limitations are based on each applicator's potential to emit. Therefore, no monitoring, record keeping or reporting is or will be required to demonstrate compliance with these emission limitations. Such requirements would be impractical and unreasonable given the nature of this emissions unit.
- b. For all chemical usage limitations, monitoring, record keeping, and reporting requirements that deal with chemical usage in this permit, the total quantity of chemical used/employed in this emissions unit during any rolling 12-month period is considered to be equivalent to the total quantity of chemical purchased and received during that rolling 12-month period, except that any quantity of chemical that can be shown to have been returned, rejected, or disposed after having been received shall not be considered to have been used.

## c) Operational Restrictions

(1) The maximum annual chemical 5, chemical 8, chemical 10, chemical 12, chemical 13, chemical 14, and chemical 15 usage rates (for emissions units R001, R002, and R003, combined) shall not exceed 338 gallons, 1238 gallons, 4077 gallons, 1993 gallons, 745 gallons, 125 gallons, and 500 gallons, respectively, based upon rolling, 12-month summations of the monthly chemicals usage rates.

(2) The maximum annual net chemical 3 and chemical 4 usage rates (for emissions units R001, R002, and R003, combined) shall not exceed 326 gallons and 2604 gallons, respectively, based upon rolling, 12-month summations of the net\* monthly chemicals usage rates.

\*The net chemicals usage rate is defined as the amount of chemicals used minus the amount of chemicals returned, rejected or disposed of as waste. In addition, it is assumed that the amount of chemicals purchased is equivalent to the amount of chemicals used/employed.

(3) The maximum annual chemical 4 and chemical 16 combined usage rate (for emissions units R001, R002, and R003, combined) shall not exceed 2604 gallons based upon a rolling, 12-month summation of the monthly combined chemical usage rates.

## d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information for emissions units R001, R002, and R003, combined:

- a. the company identification of each chemical employed;
- b. the VOC content of each chemical employed\*, in pounds of VOC per gallon of chemical;
- c. the OC content of each chemical employed, in pounds of OC per gallon of chemical;
- d. the individual HAP<sup>1</sup> content for each HAP of each chemical employed, in pounds of individual HAP per gallon of chemical;
- e. the total number of gallons of each chemical employed;
- f. the total number of gallons of chemical 3 and chemical 4 returned, rejected, or disposed of as waste;
- g. the total number of gallons of chemical 4 and chemical 16 employed;
- h. the rolling, 12-month chemicals usage rates for each chemical\*\* and chemical 4 and chemical 16 combined, in gallons;
- i. the rolling, 12-month net chemicals usage rates for chemical 3 and chemical 4, in gallons;

- j. the amount of waste removed from the facility for emissions units R001, R002, and R003, combined, in pounds;
- k. the VOC content of the waste removed, in pounds of VOC per pound of waste;
- l. the OC content of the waste removed, in pounds of OC per pound of waste;
- m. the individual HAP content for each HAP of the waste removed, in pound of individual HAP per pound of waste;
- n. the VOC emissions, in tons (i.e., the sum of (b) times (e) for each chemical minus (j) times (k) for all waste removed, and then divide by 2000);
- o. the OC emissions, in tons (i.e., the sum of (c) times (e) for each chemical minus (j) times (l) for all waste removed, and then divide by 2000);
- p. the total individual HAP emissions for each HAP from all the chemicals employed, in tons per month (i.e., for each HAP the sum of (d) times (e) for each chemical minus (j) times (m) for all waste removed plus (x)<sup>\*\*\*</sup>/12, and then divide by 2000);
- q. the total combined HAPs emissions from all the chemicals employed, in tons per month (i.e., the sum of the total individual HAP emissions in (p)); and
- r. the rolling, 12-month VOC, OC, each individual HAP, and total combined HAPs emissions, in tons.

<sup>1</sup>A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis.

\* The amount of chemicals purchased (excluding any chemicals returned or rejected during that period) is considered to be equal to the amount of chemicals employed/used.

\*\* This record does not need kept for chemical 3 and chemical 4.

\*\*\* "x" is the potential to emit of each individual HAP for all OAC rule 3745-31-03 exempt and "de minimis" emissions units in tons per year.

- (2) The permittee shall maintain monthly records of the following information for the miscellaneous industrial adhesive and sealant application process (including emissions from surface preparation and cleanup activities):
  - a. Total pounds or gallons of each adhesive, sealant, adhesive primer, sealant primer, cleanup solvent and surface preparation solvent used per calendar month;

- b. VOC content (per cent by weight and pounds per gallon) of each adhesive, sealant, adhesive primer, sealant primer, cleanup solvent and surface preparation solvent used per calendar month;
- c. The total monthly VOC emissions, before the application of capture systems and control devices, in pounds for all adhesives, sealant, adhesive primer, sealant primer, cleanup solvent and surface preparation solvent employed per calendar month; and
- d. The rolling twelve-month summation of VOC emissions, in tons, before the application of control systems and devices. The rolling twelve-month summation shall be calculated as the total VOC emissions for the current calendar month, plus the total VOC emissions from the previous eleven calendar months.

These records shall be retained for a period of five years.

- (3) The permit to install (PTI) 16-02466 for this emissions unit R002 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the PTI application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant listed in OAC rule 3745-114-01, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: methylene chloride

TLV (mg/m<sup>3</sup>): 173.61

Maximum Hourly Emission Rate (lbs/hr): 20.22\*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 2910.0

MAGLC (ug/m<sup>3</sup>): 4133.6

\*Combined emission rate for R001 and R002.

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

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - 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.).
- (5) 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing federally enforceable permit to install and operate (FEPTIO) will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final FEPTIO 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 the 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.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
    - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
      - i. the rolling, 12-month chemicals usage rate limitations as specified in c)(1) and c)(3) above;

- ii. the rolling, 12-month net chemicals usage rate limitations as specified in section c)(2) above;
  - iii. the rolling, 12-month emission limitations for VOC and OC of 21.66 tons and 31.61 tons, respectively (for emissions units R001, R002, and R003, combined);
  - iv. the rolling, 12-month emission limitations for any individual HAP and total combined HAPs of 9.95 tons and 24.9 tons, respectively (from the entire facility);
- b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

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

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

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) **Testing Requirements**

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

- a. **Emission Limitations:**

The emissions of OC from each of the following applicators: PTA-001 and PTA-002 shall not exceed 3.95 pounds per hour.

The emissions of OC from each of the following applicators: PTA-003 and PTA-004 shall not exceed 3.90 pounds per hour.

The emissions of OC from applicator PTA-005 shall not exceed 3.58 pounds per hour.

The emissions of VOC from applicator PNYA-001 shall not exceed 2.42 pounds per hour.

The emissions of VOC from applicator PEA-001 shall not exceed 1.36 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly allowable VOC or OC emission limitations above shall be demonstrated by multiplying worst-case VOC or OC content (in pounds per gallon) by the maximum hourly usage rate (in gallons).

If required and technically feasible, the permittee shall demonstrate compliance with the hourly allowable VOC and OC emission limitations based on the results of emission testing conducted in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

b. Emission Limitations:

The emissions of OC from emissions units R001, R002, and R003, combined, shall not exceed 31.61 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

The emissions of VOC from emissions units R001, R002, and R003, combined, shall not exceed 21.66 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the annual allowable VOC and OC emission limitations above shall be demonstrated through the record keeping requirements established in d)(1) above.

c. Emission Limitations:

The VOC content of each chemical purchased\*\*\* shall not exceed 4.15 pounds of VOC per gallon of chemical 3, 7.05 pounds of VOC per gallon of chemical 4, 6.76 pounds of VOC per gallon of chemical 5, 6.77 pounds of VOC per gallon of chemical 8, 0.0 pound of VOC per gallon of chemical 10, 2.79 pounds of VOC per gallon of chemical 12, 3.31 pounds of VOC per gallon of chemical 13, 7.83 pounds of VOC per gallon of chemical 14, 7.93 pounds of VOC per gallon of chemical 15, and 2.10 pounds of VOC per gallon of chemical 16.

Applicable Compliance Method:

Compliance with the allowable VOC content limitations above shall be demonstrated through the record keeping requirements established in d)(1) above.

Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the VOC contents of each chemical.

d. Emission Limitations:

The emissions of any individual HAP from the entire facility shall not exceed 9.95 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

The emissions of the total combined HAPs from the entire facility shall not exceed 24.9 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance with the annual allowable HAP emission limitations above shall be demonstrated through the record keeping requirements established in d)(1) above.

e. Usage Limitations:

The maximum annual chemical 5, chemical 8, chemical 10, chemical 12, chemical 13, chemical 14, and chemical 15 usage rates (for emissions units R001, R002, and R003, combined) shall not exceed 338 gallons, 1238 gallons, 4077 gallons, 1993 gallons, 745 gallons, 125 gallons, and 500 gallons, respectively, based upon rolling, 12-month summations of the monthly chemicals usage rates.

The maximum annual net chemical 3 and chemical 4 usage rates (for emissions units R001, R002, and R003, combined) shall not exceed 326 gallons and 2604 gallons, respectively, based upon rolling, 12-month summations of the net\* monthly chemicals usage rates.

The maximum annual chemical 4 and chemical 16 combined usage rate (for emissions units R001, R002, and R003, combined) shall not exceed 2604 gallons based upon a rolling, 12-month summation of the monthly combined chemical usage rates.

Applicable Compliance Method:

Compliance with the annual allowable chemicals usage rate limitations and the annual allowable net chemicals usage rate limitations above shall be demonstrated through the record keeping requirements established in d)(1) above.

f. Emission Limitation:

The total actual VOC emissions, before the application of air pollution control systems, from all miscellaneous industrial adhesive application processes

(including emissions from surface preparation and cleanup activities) at the facility are not equal to or greater than 3.0 tons per twelve-month rolling period.

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be demonstrated through the record keeping requirements established in d)(2) above.

g) Miscellaneous Requirements

(1) Table 4. Process 04 - PreCoat Operations Emissions Units

Applicator Number	Date of Installation	Maximum Material Usage Rate (gallon/hour)
PTA-001	1974	0.807
PTA-002	1979	0.807
PTA-003	1979	0.798
PTA-004	1982	0.798
PTA-005	1982	0.732
PNYA-001	2002	0.73
PEA-001	1974	0.374