



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov. Center

RE: **DRAFT PERMIT TO INSTALL MODIFICATION** CERTIFIED MAIL
AUGLAIZE COUNTY
Application No: 03-10257
Fac ID: 0306020025

DATE: 11/2/2006

American Trim LLC
Rajesh Thotakura, P.E.
1501 Michigan Street
Sidney, OH 45365

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. 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 modification 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 modification 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 modification a fee of **\$ 300** 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
Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

NWDO

IN

AUGLAIZE COUNTY

PUBLIC NOTICE

ISSUANCE OF DRAFT PERMIT TO INSTALL **03-10257** FOR AN AIR CONTAMINANT SOURCE FOR
American Trim LLC

On 11/2/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **American Trim LLC**, located at **713 S. Maple Street, Wapakoneta, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 03-10257:

Modification to PTI 03-10257, issued 10/29/97, to add federally enforceable HAP limitations.

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 MODIFICATION OF PERMIT TO INSTALL 03-10257

Application Number: **03-10257**
APS Premise Number: **0306020025**
Permit Fee: **\$ To be entered upon final issuance**
Name of Facility: **American Trim LLC**
Person to Contact: **Rajesh Thotakura, P.E.**
Address: **1501 Michigan Street
Sidney, OH 45365**

Location of proposed air contaminant source(s) [emissions unit(s)]:
**713 S. Maple Street
Wapakoneta, OHIO**

Description of modification:
Modification to PTI 03-10257, issued 10/29/97, to add federally enforceable HAP limitations.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

American Trim LLC

Facility ID: **0306020025**

PTI Application: 03-10257

Modification Issued: To be entered upon final issuance

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(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 are inadequate or cannot meet applicable standards.

If the construction of the proposed source(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 Ohio Administrative Code (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 applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

American Trim LLC

Facility ID: **0306020025**

PTI Application: 03-10257

Modification Issued: To be entered upon final issuance

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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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.

PERMIT TO OPERATE APPLICATION AND OPERATION AFTER COMPLETION OF CONSTRUCTION

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

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.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws and regulations.

6

American Trim LLC

PTI Application: 03-10257

Modification Issued: To be entered upon final issuance

Facility ID: **0306020025**

American Trim LLC

Facility ID: 0306020025

PTI Application: 03-10257

Modification Issued: To be entered upon final issuance

<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **American Trim, L.L.C.** located in **AUGLAIZE** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

Ohio EPA Source Number

K003 (modification)

K005 (modification)

K003, K004, K005, as a group (modification)

K004 (modification)

American Trim LLC
PTI Application: 03-10257

Facility ID: **0306020025**

Modification Issued: To be entered upon final issuance

<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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7 natural gas ovens (Clean Room #3)

Source Identification Description

Screen printing operation including: 5 screen printing machines, 2 roll coaters, and 7 natural gas ovens (Clean Room #1)

Screen printing operation including: 1 five station ultra-violet screen printing processor, 2 roll coaters, and 7 natural gas ovens (Clean Room #2)

Screen printing operation including: 4 screen printing machines, 2 roll coaters, and

American Trim LLC

Facility ID: 0306020025

PTI Application: 03-10257

Modification Issued: To be entered upon final issuance

<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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BAT Determination

Compliance with the Terms and Conditions of this permit.

Compliance with the Terms and Conditions of this permit.

Compliance with the Terms and Conditions of this permit.

American Trim LLC

Facility ID: **0306020025**

PTI Application: 03-10257

Modification Issued: To be entered upon final issuance

<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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Applicable Federal
&
OAC Rules

3745-31-05
3745-21-09(U)(2)(
f)

3745-31-05
3745-21-09(U)(2)(f)

3745-31-05
3745-21-09(U)(2)(f)

3745-31-05(C)

American Trim LLC

Facility ID: 0306020025

PTI Application: 03-10257

Modification Issued: To be entered upon final issuance

Ohio EPA Source Number	Source Identification Number	BAT Determination	Applicable Federal & OAC Rules	Permit Allowable Mass Emissions and/or Control/Usage Requirements
Permit Allowable Emissions and/or Control/Usage Requirements	OC/year (See Additional Special Terms and Conditions)	OC/year (See Additional Special Terms and Conditions)	tons OC/year (See Additional Special Terms and Conditions)	OC/year (See Additional Special Terms and Conditions)
Base Coat:	<u>Top Coat</u> 4.53 pounds VOC/gallon, excluding water and exempt solvents; 1.59 pounds OC/hour, 7.07 tons OC/year (See Additional Special Terms and Conditions)	VOC/OC Emissions from Coating Operations: <u>Base Coat:</u> 4.64 pounds VOC/gal, excluding water and exempt solvents; 1.53 pounds OC/hour, 6.69 tons OC/year (See Additional Special Terms and Conditions)	VOC/OC Emissions from Coating Operations: <u>Base Coat:</u> 3.00 pounds VOC/gal, excluding water and exempt solvents; 1.96 pounds OC/hour, 8.56 tons OC/year (See Additional Special Terms and Conditions)	9.5 tons per rolling, 12-month period for any individual HAP and 24.0 tons per rolling, 12-month period for any combination of HAPs (See Additional Special Terms and Conditions)
Base Coat:	<u>Graphic Ink</u> 3.43 pounds VOC/gallon, excluding water and exempt solvents; 0.17 pound OC/hour, 0.75 ton OC/year (See Additional Special Terms and Conditions)	<u>Top Coat</u> 4.92 pounds VOC/gallon, excluding water and exempt solvents; 1.72 pounds OC/hour, 7.57 tons OC/year (See Additional Special Terms and Conditions)	<u>Top Coat</u> 3.00 pounds VOC/gallon, excluding water and exempt solvents; 1.96 pounds OC/hour, 8.56 tons OC/year (See Additional Special Terms and Conditions)	
OC Emissions from Cleanup Operations:	OC Emissions from Cleanup Operations: 986 pounds OC/month, 6.00 tons	OC Emissions from Cleanup Operations: 986 pounds OC/month, 6.00 tons	OC Emissions from Cleanup Operations: 986 pounds OC/month, 6.00 tons	

American Trim LLC

Facility ID: 0306020025

PTI Application: 03-10257

Modification Issued: To be entered upon final issuance

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
VOC	64.24*
HAPs	9.5 tons individual and 24.0 tons combined

*NOTE: Net emissions increase of OC for emissions units K003, K004, and K005 is 27.22 tons per year as a result of these modifications.

American Trim LLC

Facility ID: **0306020025**

PTI Application: 03-10257

Modification Issued: To be entered upon final issuance

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Northwest District Office - DAPC, 347 North Dunbridge Road, P.O. Box 466, Bowling Green, Ohio 43402.**

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Northwest District Office - DAPC, 347 North Dunbridge Road, P.O. Box 466, Bowling Green, Ohio 43402.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

INTRODUCTION

American Trim LLC

Facility ID: **0306020025**

PTI Application: 03-10257

Modification Issued: To be entered upon final issuance

Superior Metal Products - Krein & Maple Facility has requested, through PTI number 03-0257, to increase VOC emissions by 27.22 tons per year. This modification to existing emissions units K003, K004, and K005 will correct

American Trim LLC

Facility ID: 0306020025

PTI Application: 03-10257

Modification Issued: To be entered upon final issuance

permitting deficiencies caused by the modification (increase in coating usage do to production) of the emissions units prior to obtaining the appropriate permit to install. This PTI supersedes PTI numbers 03-2345, 03-5214, and 03-6719.

A. APPLICABLE EMISSION LIMITATIONS AND/OR CONTROL REQUIREMENTS

1. The permittee shall not employ coatings and cleanup materials in emissions units K003, K004, and K005 that result in an exceedance of the following emission limitations:
 - a. for emissions unit K003, the limits are as follows:
 - i. Base Coat: 4.62 pounds VOC per gallon of coating, excluding water and exempt solvents, as applied;
1.52 pounds OC/hour;
6.73 tons OC/year
 - ii. Top Coat: 4.53 pounds VOC per gallon of coating, excluding water and exempt solvents, as applied;
1.59 pounds OC/hour
7.07 tons OC/year
 - iii. Graphic Ink: 3.43 pounds VOC per gallon of coating, excluding water and exempt solvents, as applied;
0.17 pounds OC/hour
0.75 tons OC/year
 - iv. Cleanup: 986 pounds OC/month;
6.00 tons OC/year.
 - b. for emissions unit K004, the limits are as follows:
 - i. Base Coat: 4.64 pounds VOC per gallon of coating, excluding water and exempt solvents, as applied;
1.53 pounds OC/hour;
6.69 tons OC/year
 - ii. Top Coat: 4.92 pounds VOC per gallon of coating, excluding water and exempt solvents, as applied;
1.72 pounds OC/hour
7.57 tons OC/year

American Trim LLC

Facility ID: 0306020025

PTI Application: 03-10257

Modification Issued: To be entered upon final issuance

- iii. Graphic Ink: 3.43 pounds VOC per gallon of coating, excluding water and exempt solvents, as applied;
0.07 pounds OC/hour
0.31 tons OC/year
 - iv. Cleanup: 986 pounds OC/month;
6.00 tons OC/year.
 - c. for emissions unit K005, the limits are as follows:
 - i. Base Coat: 3.00 pounds VOC per gallon of coating, excluding water and exempt solvents, as applied;
1.96 pounds OC/hour;
8.56 tons OC/year
 - ii. Top Coat: 3.00 pounds VOC per gallon of coating, excluding water and exempt solvents, as applied;
1.96 pounds OC/hour
8.56 tons OC/year
 - iii. Cleanup: 986 pounds OC/month;
6.00 tons OC/year.
- 2. The permittee has requested federally enforceable limitations of 9.5 tons of any individual Hazardous Air Pollutant (HAP), as defined in Section 112(b) of the Clean Air Act, and 24.0 tons of combined HAPs per rolling, 12-month period for emissions units K003, K004, and K005, combined, for the purposes of avoiding the requirements of 40 CFR Part 63, Subpart Mmmm.

To ensure federal enforceability during the first 12 calendar months of operation, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons)

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	0.83	2.08
1-2	1.65	4.15
1-3	2.48	6.23

American Trim LLC

Facility ID: 0306020025

PTI Application: 03-10257

Modification Issued: To be entered upon final issuance

1-4	3.30	8.30
1-5	4.13	10.38
1-6	4.95	12.45
1-7	5.78	14.53
1-8	6.60	16.60
1-9	7.43	18.68
1-10	8.25	20.75
1-11	9.08	22.83
1-12	9.5	24.0

After the first 12 calendar months of operation, compliance with the annual HAP emission limitations shall be based upon a rolling, 12-month summation of the monthly HAP emission rates for emissions units K003, K004, and K005, combined.

B. OPERATIONAL RESTRICTIONS

- This permit allows for the use of the coatings (base coat, top coat, graphic ink) and cleanup materials in emissions units K003, K004, and K005 specified by the permittee in PTI application number 03-0257. In conjunction with the best available technology requirements of OAC rule 3745-31-05 the VOC emission limitations specified in this permit were established in accordance with Ohio EPA's "Air Toxics Policy" and are based on both the coating and cleanup material formulation data and the design parameters of the emissions unit's exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the SCREEN-3 model and a comparison of the predicted 1 hour maximum ground level concentration to the MAGLC. The following table summarizes the results of the modeling for each pollutant.

<u>Pollutant</u>	<u>TLV (mg/m3)</u>	<u>Emission Rate (lbs/hour)</u>	<u>Modeled Ground Level Concentration (ug/m3)</u>	<u>Maximum Acceptable Ground Level Concentration (MAGLC) (ug/m3)</u>
2-etho-xyethanol	18	1.15	387.12	428.57
dipropylene glycol	600	3.83	1203.70	14,286.00
mono-methyl ether				
toluene	188	1.93	1120.00	4476.00
methyl ethyl ketone	590	0.03	86.12	14,048.00

Any of the following changes may be deemed a "modification" to the emissions units and,

American Trim LLC

Facility ID: **0306020025**

PTI Application: 03-10257

Modification Issued: To be entered upon final issuance

as such, prior notification to and approval from Ohio EPA, Northwest District Office are required, including the possible issuance of modification to PTI number 03-0257 and the operating permit.

- a. any change in the composition of the coatings or cleanup materials, or the use of new coatings or cleanup materials, that would result in the emission of a compound with a lower

American Trim LLC

Facility ID: 0306020025

PTI Application: 03-10257

Modification Issued: To be entered upon final issuance

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 specified in the above table;

- b. any change to the emissions unit or its exhaust parameters (e.g. increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an increase of any MAGLC specified in the above table;
- c. any change to the emissions unit or its method of operation that would either require an increase in the emission limitations established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01;
- d. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any additional exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01]; and
- e. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" (HAPs) as defined in OAC rule 3745-77-01 (V).

C. MONITORING AND/OR RECORD KEEPING REQUIREMENTS

1. The permittee shall collect and record the following information each month for emissions units K003, K004, and K005 (Note: These records shall be kept separate for each emissions unit, i.e., on a per line basis):

For Base Coatings:

- a. the name and identification number of each coating employed;
- b. the VOC content of each coating in pounds per gallon as applied, excluding water and exempt solvents;
- c. the number of gallons (excluding water and exempt solvents) of each coating employed;
- d. the total OC emissions from each coating employed, in pounds or tons per month [(b) x (c)];

American Trim LLC
PTI Application: 03-10257

Facility ID: **0306020025**

Modification Issued: To be entered upon final issuance

- e. the total OC emissions from all coatings employed, in pounds or tons per month [summation of (d)]; and
- f. the total OC emissions rate from all coatings employed for the calendar year to date, in tons per year [summation of (e)].

American Trim LLC

Facility ID: 0306020025

PTI Application: 03-10257

Modification Issued: To be entered upon final issuance

For Top Coatings:

- g. the name and identification number of each coating employed;
- h. the VOC content of each coating in pounds per gallon as applied, excluding water and exempt solvents;
- i. the number of gallons (excluding water and exempt solvents) of each coating employed;
- j. the total OC emissions from each coating employed, in pounds or tons per month [(h) x (i)];
- k. the total OC emissions from all coatings employed, in pounds or tons per month [summation of (j)]; and
- l. the total OC emissions rate from all coatings employed for the calendar year to date, in tons per year [summation of (k)].

For Graphic Inks:

- m. the name and identification number of each coating employed;
- n. the VOC content of each coating in pounds per gallon as applied, excluding water and exempt solvents;
- o. the number of gallons (excluding water and exempt solvents) of each coating employed;
- p. the total OC emissions from each coating employed, in pounds or tons per month [(n) x (o)];
- q. the total OC emissions from all coatings employed, in pounds or tons per month [summation of (p)]; and
- r. the total OC emissions rate from all coatings employed for the calendar year to date, in tons per year [summation of (q)].

For Cleanup Material Usage:

American Trim LLC
PTI Application: 03-10257

Facility ID: **0306020025**

Modification Issued: To be entered upon final issuance

- s. the name and identification number of each cleanup employed;
- t. the VOC content of each cleanup material, in pounds per gallon;
- u. the number of gallons of each cleanup material employed;
- v. the total OC emissions from each cleanup material employed, in pounds or tons per month [(t) x (u)];
- w. the total OC emissions from all cleanup materials employed, in pounds or tons per month [summation of (v)]; and
- x. the total OC emissions rate from all cleanup materials employed for the calendar year to date, in tons per year [summation of (w)].

Note: The permittee may also calculate monthly OC emissions rates in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal;

Monthly OC emissions from cleanup operations = (total gallons of cleanup material used X solvent density) - (total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material]) X solvent density.

- 2. In order to demonstrate compliance with the rolling, 12-month HAP emission limitations, the permittee shall collect and record the following information for emissions units K003, K004, and K005, combined:
 - a. the company identification of each coating employed;
 - b. the pounds per gallon of each HAP in each coating, as applied;
 - c. the number of gallons of each coating employed;
 - d. the emission rate, in pounds, for each HAP from each coating employed [(b) x (c)];
 - e. the total emission rate for each HAP from all coatings employed [summation of (d) for each HAP], in pounds per month;
 - f. the total HAP emission rate for the combination of all HAPs from all coatings employed [summation of (e)], in pounds per month;
 - g. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month; and

American Trim LLC

Facility ID: **0306020025**

PTI Application: 03-10257

Modification Issued: To be entered upon final issuance

- h. after the first 12 months of operation under the provisions of this permit, the annual emissions of each HAP and the combination of all HAPs, based upon a rolling 12-month summation;

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

American Trim LLC

Facility ID: 0306020025

PTI Application: 03-10257

Modification Issued: To be entered upon final issuance

D. 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 noncomplying coatings. 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 also submit annual reports which specify the total OC emissions from emissions units K003, K004, and K005 for the previous calendar year.

These reports shall be submitted by January 31 of each year.

3. The permittee shall submit quarterly deviation (excursion) reports for emissions units K003, K004, and K005, combined, as follows:
 - a. For the first 12 calendar months of operation, the permittee shall submit deviation (excursion) reports, which identify any exceedances of the maximum allowable cumulative HAP emission levels specified in Section A.2.
 - b. After the first 12 calendar months of operation, the permittee shall submit deviation (excursion) reports, which identify any exceedances of the rolling, 12-month HAP emission limitations.

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

E. COMPLIANCE METHODS AND TESTING REQUIREMENTS

1. Compliance Methods Requirements

Compliance with the emission limitation(s) in Section A.1-5 of these Additional Special Terms and Conditions shall be determined in accordance with the following method(s):

a. Emission Limitation

K003

4.62 pounds VOC/gallon coating, excluding water and exempt solvent - base coat

4.53 pounds VOC/gallon coating, excluding water and exempt solvent - top coat

American Trim LLC

Facility ID: 0306020025

PTI Application: 03-10257

Modification Issued: To be entered upon final issuance

3.43 pounds VOC/gallon ink, excluding water and exempt solvent - graphic ink

K004

4.64 pounds VOC/gallon coating, excluding water and exempt solvent - base coat

4.92 pounds VOC/gallon coating, excluding water and exempt solvent - top coat

3.43 pounds VOC/gallon ink, excluding water and exempt solvent - graphic ink

K005

3.00 pounds VOC/gallon coating, excluding water and exempt solvent - base coat

3.00 pounds VOC/gallon coating, excluding water and exempt solvent - top coat

Applicable Compliance Method

Compliance shall be based on OAC rule 3745-21-10(B). USEPA Methods 24 and 24A shall be used to determine the VOC contents for (a) coatings and (b) flexographic and rotogravure printing inks and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

b. Emission Limitation

K003

1.52 pounds OC/hour* - base coat

1.59 pounds OC/hour* - top coat

0.17 pound OC/hour* - graphic ink

986 pounds OC/month - cleanup

K004

1.53 pounds OC/hour* - base coat

1.72 pounds OC/hour* - top coat

0.07 pound OC/hour* - graphic ink

986 pounds OC/month - cleanup

K005

1.96 pounds OC/hour* - base coat

1.96 pounds OC/hour* - top coat

986 pounds OC/month - cleanup

Applicable Compliance Method

Compliance shall be based upon the recordkeeping specified in Section C above.

*Note: These hourly limits represent each unit's "maximum capacity" i.e., its

American Trim LLC

Facility ID: **0306020025**

PTI Application: 03-10257

Modification Issued: To be entered upon final issuance

potential to emit based on a maximum hourly coating application rate and a maximum coating VOC content. Although this permit does not require periodic recordkeeping to verify compliance with this limit, the permittee shall maintain adequate records in the facility's files to verify that the emissions unit's maximum capacity has not been increased.

American Trim LLC

Facility ID: 0306020025

PTI Application: 03-10257

Modification Issued: To be entered upon final issuance

c. Emission Limitation

K003

6.73 tons OC/year - base coat

7.07 tons OC/year - top coat

0.75 ton OC/year - graphic ink

6.00 tons OC/year - cleanup

K004

6.69 tons OC/year - base coat

7.57 tons OC/year - top coat

0.31 ton OC/year - graphic ink

6.00 tons OC/year - cleanup

K005

8.56 tons OC/year - base coat

8.56 tons OC/year - top coat

6.00 tons OC/year - cleanup

Applicable Compliance Method

Compliance shall be based upon the recordkeeping specified in Section C above.

d. Emission Limitation

Combined limits for emissions units K003, K004, and K005:

9.5 tons individual HAP per rolling, 12-month period

24.0 tons combined HAPs per rolling, 12-month period

Applicable Compliance Method

The permittee shall demonstrate compliance with these emission limitations in accordance with the recordkeeping requirements specified in Section C.2.

Synthetic Minor Determinations

A. Source Description

American Trim, L.L.C facility is involved in the coating of miscellaneous metal parts. The facility is comprised of three coating operations.

B. Facility Emissions and Attainment Status

American Trim LLC

Facility ID: **0306020025**

PTI Application: 03-10257

Modification Issued: To be entered upon final issuance

The issuance of this proposed permit will establish American Trim L.L.C. as a minor stationary source for Title V and Maximum Achievable Control Technology (MACT) applicability by the establishment of synthetic minor limitation on HAPs. American Trim, L.L.C. is located in Auglaize County which is in attainment for all criteria pollutants

C. Source Emissions

The proposed permit will also establish the following HAP limitations:

9.5 tons/rolling 12-month period for any individual HAP from all coating operations (emissions unit K003, K004, & K005 combined)

24.0 tons/rolling 12-month period for any combination of HAPs from all coating operations (emissions unit K003, K004, & K005 combined)

D. Conclusion

The establishment of synthetic minor limitations on HAPs will establish American Trim, L.L.C. as a minor stationary source for Title V, and Maximum Achievable Control Technology (MACT) applicability.